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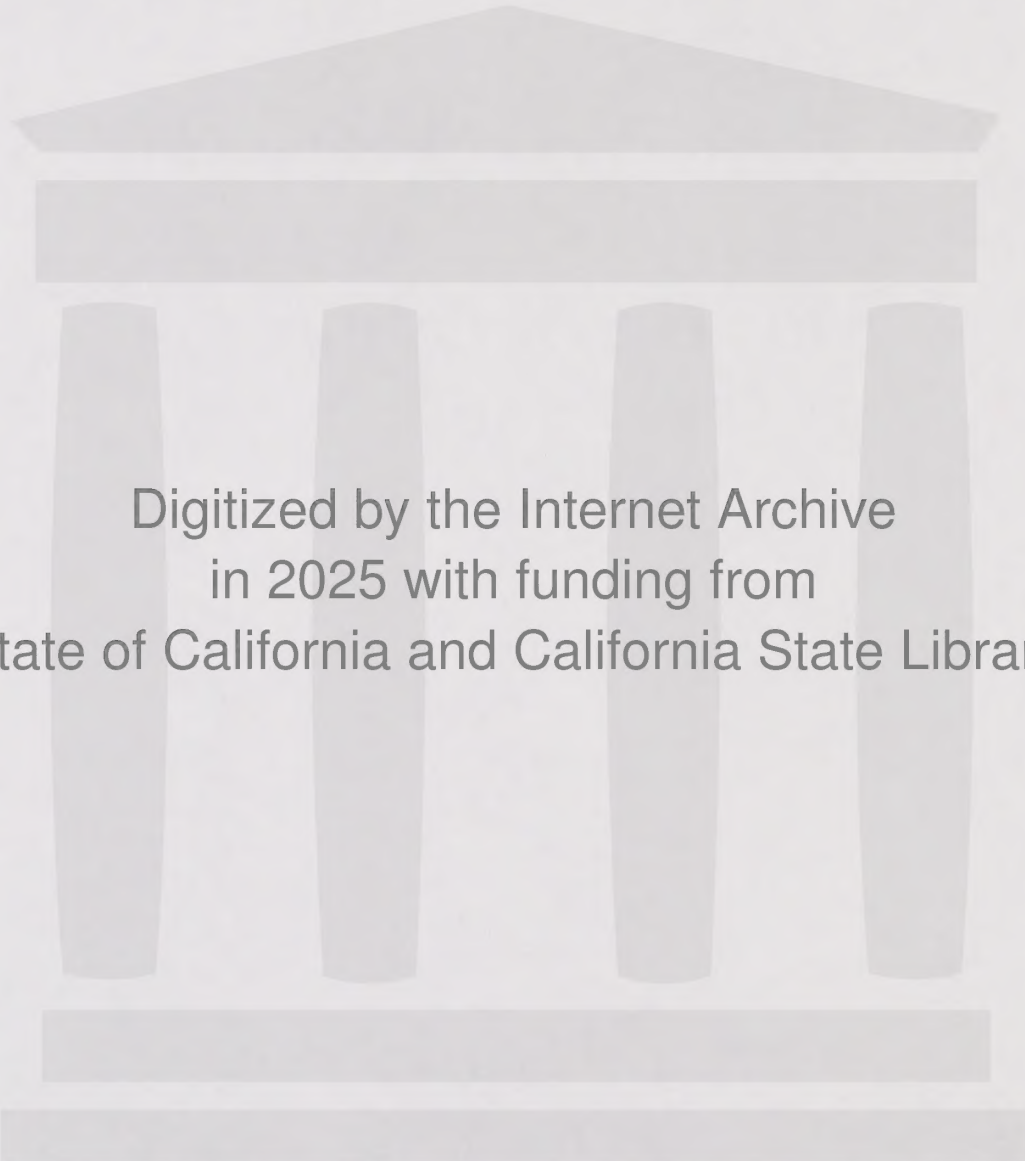
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CITY OF EL CENTRO

Americans With Disabilities Act Title II Self-Evaluation and Transition Plan September 2000

Prepared for:
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The requirements of the Americans with Disabilities Act (ADA) are subject to various and possibly contradictory legal interpretation. Equal Access has used its reasonable professional efforts and judgements to interpret the statutory language of the ADA, the U.S. Department of Justice regulations, the Technical Assistance Manual for Title II, and the U.S. Equal Employment Opportunity Commission Technical Assistance Manual for Title I, in drafting the City of El Centro Title II Self-Evaluation. The information presented in the self-evaluation report is intended solely as guidance, and is neither a determination of the City of El Centro's legal rights or responsibilities under the ADA, nor binding on any agency with enforcement responsibility under the ADA. Equal Access assumes no liability for the outcomes of decisions, contracts, commitments, or obligations made on the basis of this report.

City of El Centro
Americans With Disabilities Act
Title II Self-Evaluation and Transition Plan

Table of Contents

<i>Introduction.....</i>	<i>1</i>
PART ONE:	
Legislative Overview of Title II	3
PART TWO:	
The Self-Evaluation Process for the City of El Centro.....	9
PART THREE:	
City of El Centro Self-Evaluation Findings and Recommendations.....	12
An Overview of City Programs, Activities and Services.....	12
General Nondiscrimination Policies and Practices in the Operations of City of El Centro Programs, Activities, and Services.....	15
Finding Regarding the Overall Operations of City Programs and Services	16
Recommendations Regarding the Overall Operation of City Programs and Services	17
Finding Regarding the Operation of City Police Department Services and Programs.....	18
Recommendations for Ensuring General Nondiscrimination in City Police Services and Programs	18
Equally Effective Communication in City of El Centro Programs, Activities, and Services	19
Findings Regarding Equally Effective Communications in City Programs, Activities and Services.....	19
Recommendations for Providing Equally Effective Communications in City Programs, Activities and Services	20
Program Accessibility For Individuals with Disabilities Using City of El Centro Services and Programs.....	22
Findings Regarding Program Accessibility	22

Recommendations for Providing Program Access to Individuals with Disabilities.....	22
Administrative Requirements.....	24
Designating a Responsible Employee.....	24
Providing Notice of ADA Rights and Protections.....	24
Establishing a Grievance Procedure	25
Appendices.....	26
Appendix A: Sample Notice	27
Appendix B: Sample Municipal Grievance Procedure	28
Appendix C: City of El Centro Transition Plan	29
PART FOUR	
Public Street Intersections.....	30
Transition Plan Recommendations	

Introduction

The Americans with Disabilities Act of 1990 (ADA) is a comprehensive civil rights law that prohibits discrimination against qualified individuals with disabilities in the areas of employment, state and local government services, public accommodations, transportation, and telecommunications. Title II of the ADA prohibits public entities from discriminating against or excluding people with disabilities from programs, activities or services on the basis of disability.

Title II requirements are very similar to the requirements of Section 504 of the Rehabilitation Act of 1973, which prohibits discrimination by all entities that receive federal financial assistance. As with Section 504, Title II requires public entities to conduct a self-evaluation of their policies and practices.

This report describes the current status of the City of El Centro's self-evaluation. It presents proposed implementation steps, actions which the City of El Centro could take to bring the City into compliance with the requirements of Title II.

The self-evaluation report is the product of a comprehensive survey of the City of El Centro's facilities, and a review of the ways in which the policies and operating procedures of the City's programs, services and activities affect persons with disabilities. An assessment has been made of the resources needed to effectively accommodate persons with disabilities, and modifications necessary to eliminate procedural and communications barriers.

This Self-Evaluation and Transition Plan report is organized into four sections:

Part One: Legislative Overview of Title II

In Part One the requirements of Title II of the Americans with Disabilities Act are outlined.

Part Two: The Self-Evaluation Process for the City of El Centro

This section briefly describes the methodology used to conduct this self-evaluation.

Part Three: City of El Centro Self-Evaluation Findings and Recommendations

Part Three of this report contains six subsections. The first is an overview of the programs, activities and services operated by the City of El Centro. In the next four subsections, the findings of the self-evaluation are discussed in detail.

Part Four: Transition Plan Recommendations

This section identifies architectural barriers requiring modification and removal to allow full participation of qualified individuals with disabilities in the program, activities, and services offered by the City.

The findings of the three Self-Evaluation sections are organized into four broad areas according to the requirements outlined in Title II:

- General Non-Discrimination Requirements;
- Equally Effective communication;
- Program Accessibility; and
- Employment.

In these sections, implementation steps are recommended. These are actions the City of El Centro could undertake in developing or modifying policies and practices, developing communication capacity, and creating access to programs and facilities.

The final section Part Three discusses three other Title II administrative requirements for public entities:

- (1) designating a responsible employee as ADA Coordinator;
- (2) providing notice of ADA requirements; and
- (3) establishing a grievance procedure.

The recommendations regarding the structural changes to existing facilities which are needed to achieve program accessibility are described in Part Four: the City of El Centro Transition Plan Recommendations.

Ensuring accessibility of City programs, activities and services is an on-going effort. To support this on-going effort, people with disabilities and other concerned individuals and organizations are invited to comment on this report.

Comments may be provided in writing, by phone, or in person directly to the City of El Centro ADA Coordinator:

Kenneth G. Skillman III, P.E., L.S.
City of El Centro
1275 Main Street
El Centro, CA 92243-2816
(760) 337-4574

Copies of this report are available from the ADA Coordinator and will provide as necessary in alternative accessible formats upon request: large print, or diskette. Any persons needing assistance to present their comments may also request such assistance from the ADA Coordinator.

PART ONE:

Legislative Overview of Title II

This brief overview of the ADA's requirement for state and local governments is drawn directly from the statute [42 USC Section 12101 et seq., also known as Public Law 101-336], the Department of Justice's regulations [28 CFR Part 35], the U.S. Equal Employment Opportunity Commission Technical Assistance Manual for Title I of the ADA [EEOC ADA Title I TAM]. These citations are also referenced in subsequent sections of this self-evaluation report.

Who Must Comply With Title II?

Title II of the ADA covers "public entities," defined as:

- (1) any state or local government;
- (2) any department, agency, special purpose district, or other instrumentality of a state or local government;
- (3) certain commuter authorities as well as Amtrak [28 CFR Section 35.104].

What Activities Are Covered?

Title II of the ADA prohibits discrimination against qualified individuals with disabilities by public entities. Activities covered include:

- the operation of all programs and services offered by a public entity;
- the employment practices of the entity;
- government services carried out by contractors;
- activities of state and local legislative and judicial branches; and
- public transportation services offered by a public entity.

Title II applies regardless of the size of the public entity.

Who is Protected Under Title II? Who is a "Qualified Individual With a Disability?"

Protections under Title II of the ADA are specifically afforded to any qualified individual with a disability. A person with a disability is defined as an individual who:

- (1) has a physical or mental impairment that substantially limits one or more major life activities; or
- (2) has a record or history of such an impairment; or

(3) is perceived or regarded as having such an impairment [28 CFR Section 35.104].

The definition of “qualified individual with a disability” takes two forms, depending on the type of activity involved.

For purposes of determining participation in programs and services offered by a public entity, a person is considered qualified if the individual meets the essential eligibility requirements for the receipt of services or participation in programs or activities [ADA Title II TAM, II-2.8000].

For purposes of employment, a qualified individual with a disability who satisfies the requisite skill, experience, education and other job-related requirements of the employment position the individual holds or desires, and who can perform the essential functions of the job, with or without reasonable accommodation. [EEOC ADA Title I TAM, II-11 and II-12].

Direct Threat to Health or Safety

If an individual poses a “direct threat” to the health or safety of others, he or she is not considered a qualified individual with a disability. Based on reliable information, this individual may be excluded from a public entity’s program or service. A direct threat must be significant risk to the health and safety of others that cannot be eliminated or reduced to an acceptable level by the public entity’s modification of its policies, practices, or procedures or by the provision of auxiliary aids or services. Determination of the existence of direct threat must be based on objective factual information, not on generalizations, fears, or misconceptions about a person’s disability [28 CFR Section 35.104].

In the employment context, the direct threat standard is also a strict one. A direct threat is the existence of a substantial risk of significant harm to the health or safety of the individual with the disability or others that cannot be eliminated or reduced by reasonable accommodation [29 CFR 1630.2(r)].

Title II Requirements For Public Entities

The requirements of Title II fall into four broad areas: general non-discrimination requirements, equally effective communication, program accessibility, and employment.

General Nondiscrimination Requirements

This Subpart of Title II regulations addresses the basic mandate of the ADA: that no qualified individual with a disability shall be excluded from participation, denied benefits, services, or activities, or be subjected to discrimination by a public entity [28 CFR Section 35.130(a)]. Areas specifically addressed include:

- affording persons with disabilities an equal opportunity to participate in and benefit from programs, activities, and services.

- prohibiting eligibility criteria that directly or indirectly screen out an individual with a disability;
- providing for integrated programs and services;
- providing a person with a disability with a choice to participate in regular programs even if special programs are offered;
- imposing no special charges on individuals with disabilities to cover the costs associated with providing access;
- ensuring that methods of administration of programs, activities and services do not discriminate on the basis of disability;
- prohibiting discrimination against qualified individuals with disabilities when granting licenses and certification; and
- prohibiting discrimination on the basis of disability by contractors [28 CFR Sections 35.130 (b)(1)—35.130 (b)(8)].

Equally Effective Communication

This Subpart of Title II regulations addresses the requirement that public entities ensure that their communications with applicants, participants, and members of the public with disabilities are as effective as their communications with others [28 CFR Section 35.160 (a)].

When necessary to ensure effective communications, public entities must furnish auxiliary aids and services; which can include, but are not limited to: qualified interpreters, real-time captioning, readers, notetakers, text telephones, sound amplification systems, use of computer equipment, and documents in large print, on audio cassette tape, on computer diskette, or in Braille. Public entities should also develop policies which specify how they will respond to requests that auxiliary aids and services be provided. Public entities are required to give primary consideration to the specific aid or service requested by a person with a disability, but may choose to provide another aid or service, as long as that aid or service affords the individual equally effective communication [28 CFR Section 35.160 (b)(1) and (b)(2)].

Program Accessibility

Public entities must ensure that their programs are accessible to and useable by people with disabilities. Each program must be viewed in its entirety while determining whether it is useable and accessible [28 CFR Section 35.150 (a) and 34 CFR Section 104.22 (a)]. This “program accessibility” standard, set forth by Title II of the Americans with Disabilities Act and by Section 504 of the Rehabilitation Act of 1973, can be met by various means.

In many situations, providing access to facilities through structural methods, such as alteration of existing facilities or construction of new facilities, may be the most efficient method of providing program accessibility. However, the public entity may pursue alternatives to structural changes in order to achieve program accessibility. Non-structural methods include acquisition or redesign of equipment, assignment of aides to assist people with disabilities, and provision of services at alternative sites [ADA Title II TAM, II-5.200].

For example, relocating a program or service from an inaccessible location to an accessible one is an effective means of providing program accessibility for people with mobility impairments. However, such relocation would not be effective if the primary entrance to the building in question is not physically accessible, or if the path of travel to the accessible service location is inaccessible. In these cases, structural alterations would be required [28 CFR Section 35.150 (b)(1) and 34 CFR Section 104.22 (b)].

The program accessibility standard also includes providing accessibility for people who have visual and hearing impairments, as well as other disabilities. Therefore, it extends to the provision of accessible signage (large print and Braille) and visual emergency alarms when alarms are not present to effectively communicate with people who have hearing and vision disabilities.

Furthermore, the program accessibility standard includes the requirement that the accessible features of new and existing facilities be maintained [28 CFR Section 35.133 (a)]. For example, accessible entrances must be kept unlocked when facilities of a public entity are open for business, and boxes or other obstructions to accessible paths of travel must be removed. Ramp and stairway handrails should be kept free of obstacles, and equipment needed to provide program accessibility (such as a copier with zoom features to provide large print copies, a sound amplification system, a wheelchair lift, or an elevator) must be maintained in working order.

The program accessibility standard applies not only to facilities that a public entity owns, but also to buildings and facilities that it leases [28 CFR Section 35.131 (c)(Preamble)].

The program accessibility standard includes providing aides to assist people with disabilities to access programs and services, if needed [28 CFR Section 35.150 (b)(1) and 34 CFR Section 104.22 (b)]. It also extends to the purchase, maintenance or redesign of equipment which provides program accessibility to individuals with disabilities when needed [28 CFR Section 35.150 (b)(1) and 34 CFR Section 104.22 (b)].

Employment

Title II prohibits all public entities, regardless of size of workforce, from discriminating in their employment policies and practices against qualified individuals with disabilities [28 CFR Section 35.140 (a)]. For those public entities that have 15 or more employees, Title II applies the employment standards contained in Title I of the ADA, published by the Equal Employment Opportunity Commission.

Title I of the ADA prohibits discrimination against qualified persons with disabilities in any aspect of the employment relationship. Activities covered include the application process, testing, interviewing, hiring, assignments, evaluation, discipline, medical examinations, compensation, promotion, on-the-job training, layoff / recall, termination, leave, and benefits such as health insurance [29 CFR Section 1630.4].

In addition, Title I obligates an employer to provide a reasonable accommodation to the known physical or mental limitations of a qualified applicant or employee with a disability unless it can be shown that the accommodation would impose an undue hardship on the employer [EEOC ADA Title I TAM, III-1].

Reasonable accommodation is a modification or adjustment to a job, the work environment or the way things usually are done [EEOC ADA Title I TAM, III-2]. Reasonable accommodation must be provided when necessary to enable applicants or employees to enjoy equal opportunity in the hiring and promotion process, to participate in all employment related benefits and activities, and to perform the essential functions of the job. Examples of reasonable accommodation include adjusting work schedules, restructuring the job, reassigning the employee to a vacant position, acquisition or modification of equipment, providing qualified readers or interpreters, or modifying the work site [29 CFR Section 1630.0(o)(2)].

Title I will not be addressed in this report.

Administrative Requirements

The ADA outlines administrative actions which are required of a public entity to bring it into compliance with Title II regulations. They are described in detail in federal regulations [28 C.F.R. Sections 35.105-35.107;35.150-(c) and (d)]; and the Title II Technical Assistance Manual [ADA Title II TAM, II-8.0000]. The following actions are included.

Designate a Responsible Employee for ADA Compliance Coordination

A public entity that employs 50 or more persons must designate at least one employee to coordinate ADA compliance. The coordinator's role includes:

- planning and coordinating overall compliance efforts; and
- receiving and investigating grievances pertaining to programs, services, practices, and employment.

Provide Notice of ADA Requirements

All public entities, regardless of size, must provide to applicants, participants, beneficiaries, employees, and other interested persons information about the rights and protections afforded by Title II of the ADA.

Establish a Grievance Procedure

The adoption and publication of grievance procedures providing for prompt and equitable resolution of grievances arising under Title II of the ADA is required for all public entities with 50 or more employees.

Conduct a Self-Evaluation

All public entities, regardless of size, must evaluate their current services, programs and activities, and review all their related policies and practices. Through this self-evaluation, the public entity should identify those policies and practices that do not comply with Title II requirements, and modify such policies and practices to bring them into compliance. A public entity with 50 or more employees must keep the self-evaluation information on file and available of public inspection for at least three years.

Develop a Transition Plan

Public entities with 50 or more employees must develop a transition plan if structural changes to existing facilities are needed to achieve program access. The transition plan must identify physical obstacles that limit program access, describe the methods used to make the facilities accessible, provide a schedule for making structural changes, and identify the public official responsible for implementation of the transition plan.

Except for issues related to physical accessibility, which are described in the City of El Centro Transition Plan Recommendations, all of these administrative requirements are addressed in Part Three of this self-evaluation report.

PART TWO:

The Self-Evaluation Process For the City of El Centro

Project Scope

On December 1, 1999, the City of El Centro entered into an agreement with Equal Access, Consulting Architects, Inc. to conduct a self-evaluation of its programs, activities and services; to complete a survey of its existing physical facilities and parks, and to develop a transition plan

Information concerning the survey of El Centro's physical facilities (its public buildings, and the parks located in the City) can be found in a separate bound document, the City of El Centro Existing Conditions Field Documentation Surveys which, is also available for public review.

The remainder of this section discusses the steps involved in conducting the self-evaluation of the City of El Centro's programs, activities and services. The findings of the self-evaluation, and resulting recommendations for facilitating access to the City's programs, activities and services for people who have disabilities, are found in Part Three.

Steps in The Self-Evaluation Process

Step One: Identifying City Programs, Activities and Services

To obtain an overview of the city of El Centro programs, activities and services, Equal Access held discussions with Mr. Kenneth Skillman and representatives from various departments within the city. Further overview information about the array of services provided by the City was gathered from support staff in the City Manager's office.

Step Two: Conducting a Meeting with City of El Centro Department Staff

After obtaining this initial overview, Equal Access gathered information about the specific programs, activities and services that each City Department provides, the scope of contact with the public that department staff typically have, and the policies and procedures which govern how public contact is conducted. The following persons attended the initial meeting:

	<u>Department</u>
• Abdel Salem,	City Manager
• Kenneth G. Skillman III, P.E., L.S.,	Development Services / City Engineer
• Rita M. Noden,	City Clerk
• Steve Hogan,	Public Works
• Lisa Granahan, Exec. Asst.,	City Manager
• Dean Davidson,	Building Department
• Luis F. Hernandez,	Legal

- Norma Villicana, Planning and Housing
- Phillip Carr, Administrative Services
- Raymond Loela, Police Department
- Charles Beard, Fire Department
- Lois Shelton, Library

Copies of the “Self-Evaluation and Checklist” forms as found within the “Section 504 Compliance Handbook.” (Published by Thompson Publishing Group of which the City of El Centro is a subscriber) was provided to and completed by the following City departments:

- City Manager – Lisa Granaham
- City Clerk – Rita Noden
- Department of Administrative – Chris Renn and Phillip W. Carr
Services / Customer Services
- Personnel Department – Eva Shaw
- Development Services – Stacey Cox, Staff Assistant
- Economic Development – Marty Tracey
- Planning and Housing – Oliver M Alvarado and Norma M. Villicana
- Building and Safety – Dean Davidson
- Public Works – Rosie Estrada, Staff Assistant
- Fire Department – Linual White, Battalion Chief / Fire Marshal
- El Centro Police – Raymond Loera
- El Centro Public Library – Lois Shelton,
- Parks Services – Cliff Hamrick Jr.
- Recreation – Terri Lovio, Staff Assistant

The questions put forth by the forms focused on various factors pertaining to accessibility including participation of disabled persons; nature of the programs offered by the City; advertisement, admission and participation in the various programs; facilities offered for use; ad communication.

A copy of this form is appended to this report for the reader’s reference. (See appendix A-1)

Step Three: Collecting and Reviewing Materials Provided to the General Public by Each City Department

At the very beginning of the self-evaluation process, Equal Access requested that the City Manager’s office inform each City Department about the purpose and scope of the self-evaluation that was to be conducted.

Because of this notification, each City Department was able to provide the evaluators with copies of forms, notices and applications given to the public, copies of informational brochures, and copies of notices and agendas from public meetings held by the El Centro City Council and the City of El Centro Planning Commission.

The documents and forms submitted for review also included the City of El Centro Policy Manual, City job announcements and employment application forms; and application forms for all members of the public who wish to participate in City sponsored services and activities. Upon obtaining copies of these materials, a review was conducted. The primary purpose of this review were to determine if the materials contained any discriminatory language or if discriminatory questions were used; and to determine if documents were available in alternative formats accessible to people with vision, hearing, learning or cognitive disabilities. Such alternative formats include, but are not limited to: large print, ASCII computer disk, audio cassette tape, and/or Braille.

Step Four: Reviewing Written Policies and Procedures Used by Each City Department When Serving Members of the Public

When available, City Departments also furnished the self-evaluation team with copies of written policies and procedures which govern the nature of their contact with the public. The purpose of reviewing these policies and procedures is to check for discriminatory policies or practices, whether or not such discrimination is intended or is inadvertent.

After completing these four steps, Equal Access compiled the self-evaluation findings and developed a list of recommendations to improve access for people with disabilities to City of El Centro programs and services. The findings of the self-evaluation and the resulting recommendations are discussed in Part Three of this self-evaluation report.

PART THREE:

City of El Centro Self-Evaluation Findings and Recommendations

An overview of the Programs, Activities and Services Operated by the City of El Centro

The City of El Centro sponsors public programs and offers a variety of public services through its City departments. The activities of these departments and the services they offer are summarized below.

The City Manager's Office

The City Manager's office provides the public with general information about City procedures and services. It furnishes copies of ordinances, minutes of public meetings, and public meetings agendas to members of the public on request. The City Manager is the person responsible for the overall administration of all of the City of El Centro's programs, activities and services, and the City Manager's office exists to provide the necessary support for this administration.

Members of the public who wish to attend public meetings and need to use the available assistive listening system must request use of this system from City staff.

The Office of The City Clerk

The City Clerk is responsible for maintaining all public records, taking the minutes of all public meetings, preparing copies of ordinances which are passed by the City Council, and overseeing all procedures which are related to City elections. These include the filing of initiatives and petitions, taking applications from and administering oaths to candidates running for public office, collecting paperwork and various election fees, issuing various licenses, and swearing in those candidates who have been elected. The City of El Centro also has a Web site on which many types of public information are posted.

The Department of Administrative Services / Customer Service

This Department assesses and bills City of El Centro residents for the cost of their water, sewer, garbage and recycling services, which the city provides. Members of the public visit this office to pay their bills for these utilities, and to have their questions about City services answered. The office staff also take public inquiries about various types of City services over the telephone on a regular basis. In addition to utility bills, the Department also mails out various informational brochures about water, garbage and recycling services to residents of El Centro.

The Public Works Department

The Public Works Department is responsible for maintenance of water mains, sewers, landscaping streets and sidewalks in the City of El Centro. It receives telephone calls from residents about such problems as broken water mains, downed trees, or potholes in streets. It mails residents information about such issues as temporary interruption of home water service, temporary street closures for repairs, and notification about other repairs. In general, public contact with this office is limited to inquiries and responses via telephone or fax to notices that the department mails to the public.

Administrative Services

The Administrative Services Department provides internal services to all City Departments. These include all accounting services, collection of all receipts, generation of budgets and fiscal reports, and the investment of City funds. In general, the Finance Department staff has no contact with the public at large. Members of the public who wish to give input to the Finance Department do so at public City Council meetings, which take place twice per month.

Developmental Services

Developmental Services includes Building & Safety, Planning and Housing, and the Engineering Department. The Building Dept. issues building permits and accepts requests for building inspections from members of the public. It conducts building inspections and monitors various activities of contractors and building owners to ensure that required conditions are met. Staff of the Community Development Department also review the plans of builders and developers and advise builders and developers about the necessary steps they need to take to proceed with planned projects. These steps include applying for required permits, complying with a variety of regulations, and other actions deemed necessary by the City.

In addition, the Building Dept. and Planning Departments operates a permit information telephone line for members of the community, builders, and developers who wish to apply for building permits or land use permits from the City of El Centro.

The Engineering Department reviews plans for City projects such as installation of streets, sewers, gutter, and landscaping. All of these projects must meet City standards.

Engineers also write plans and specifications for projects that are needed to develop the City's infrastructure. They bid out these projects, and review bids submitted by various contractors to ensure that they meet City standards and specifications. Bids are generally publicized by means of printed advertisements in local newspapers that have circulations within El Centro. Notification of upcoming bids is also sent to the local builder's exchanges.

The Engineering Department also issues permits to builders and contractors, including encroachment permits, and grading permits.

Public contact with Engineering Department staff frequently takes place over the telephone, but builders and builder's representatives also come into the public counter in the Department to apply for permits or to have their plans reviewed by engineers. On a drop by basis, members of the public may also check on the status of plans that have been submitted.

The City of El Centro Police Department

The City of El Centro Police Department provides all police services for the city. In addition to the services ordinarily associated with most city police departments, the City of El Centro Police Department operates a volunteer program, called "PAX" (Latin word meaning "peace"). PAX participants are retired citizens and other community volunteers, who have had formal training and have ascribed to a code of good conduct. They assist members of the El Centro Police Department with tasks such as vehicle maintenance, installation of street barricades, etc. Recruits for the PAX program are obtained via advertising in local newspapers, community outreach, and word of mouth. A citizen's ride-along program is also operated by the El Centro Police Department.

Another program directly operated by the El Centro Police Department is the Police Athletic League, offered to the youth of El Centro.

The El Centro Police Department also offers informal in-school drug abuse prevention programs, and an Explorer Scout program.

The El Centro City Council and the Planning Commission

These governing bodies meet on alternate Tuesdays and Wednesdays in the City Council Chambers. Members of the public with disabilities who have attended meetings have been accommodated. Disability accommodations which are currently provided include an assistive listening system, which is available upon request from City clerk, and tape recorded meeting proceedings.

The Fire Department

The City of El Centro Fire Department provides all fire services for the City including fire fighting, as well as, the prevention of and response to safely mitigate disasters and emergencies.

The Fire Department also provides verbal and written information regarding preventative and safety measures to the general public. This information is either delivered directly to requesting party's facilities, or dispersed through city facilities such as the City Hall Council Chamber, Community Center, or Public Library.

The "Prevention Office" located at Fire Station #2, 900 S. Dogwood Road, has also been identified as a source for information, reports, and public contact.

El Centro Public Library

In addition to the normal functions of providing reading and computer materials the Library also provides movies, arts and crafts, reading programs, and community meetings.

Areas within the Library site also used for programs, services, and activities include the parking lot, and walkways / courtyard and the "McGee Room".

Auxiliary aids provided include Braille books, large print books, and close captioned videos.

Parks and Recreation

The City of El Centro has twelve parks and one community center within its jurisdiction. These parks vary in size and in the amenities provided.

Most of these parks provide parking for public convenience. All forms of public gathering and recreational activities normally associated with parks are provided at the city parks.

Additionally, the Recreation Department coordinates and provides facilities for the following programs, services, and activities:

- Special Olympics
- Senior Citizens Programs
- Imperial Valley Center Exceptional Children (IVCEC)
- Jacques and Jills Sports Gym
- Senior Nutrition Program – Catholic Charities

General Nondiscrimination Policies and Practices in the Operation of City Programs, Activities and Services

With regard to people with disabilities, general nondiscrimination is required in both the written and the actual operating practices of each City program, activity or service. Policies and practices which are identified to be discriminatory must be modified without delay.

The number of written policies and procedures governing the operation of City of El Centro programs, activities and services which were available to the reviewers were limited. However, the self-evaluation team did review the City of El Centro Council / Administrative Policy Manual, and written policies and procedures from the Police Department, Community Development, Building and Safety, Planning and Housing, Engineering Department, and Human Resources.

The self-evaluation team also reviewed application forms, public notices, announcements of public meetings, announcements of City of El Centro job openings, and informational brochures concerning City programs and services.

For the most part, with very few exceptions, this review of written policies, practices and procedures, including forms, did not reveal material that was overly discriminatory in nature.

What was noted was the absence, in some cases, of specific written policies that would effectively prohibit discriminatory practices in the carrying out of certain City activities and in the operation of some City programs.

Specific areas where these nondiscrimination policies would be helpful in preventing inadvertent discrimination are discussed in the sections below.

Findings Regarding the Overall Operation of City Programs and Services

There were no written policies in evidence which specifically prohibit discrimination against people with disabilities in the operation and administration of City of El Centro programs and services.

There also were no written policies prohibiting eligibility criteria for programs and services which screen out, or tend to screen out people with disabilities.

People with disabilities may only be screened out from participating in City programs and services on the rare occasions when their participation is determined to be a direct threat to others. There were no written policies in evidence setting forth criteria and procedures for determining the existence of such a "direct threat." The ADA requires that the determination of "direct threat" must be made on the basis of factual information about the specific individual's actual disability, and not on the basis of rumors, hearsay, or generalized fears about disabilities [ADA Title II TAM, II 2.8000].

There were no written policies specifically prohibiting the provision of unequal opportunities to people with disabilities to participate in or benefit from City programs and services. There were no written policies which provide for the delivery of services and operation of programs in integrated settings.

There were no written policies setting out the mandatory requirement that each City Department makes reasonable modifications to their policies, practices and procedures, when needed, to ensure equal participation by people with disabilities.

There also were no written policies prohibiting the imposition of surcharges on people with disabilities to offset the cost of ADA compliance.

Furthermore, specific written policies prohibiting discrimination against people with disabilities through the City's licensing and certification procedures and through its choice of procurement contracts were not in evidence in the City of El Centro Policy Manual. They should be developed by the City of El Centro. It is also in the City's best interest to ensure that its contractors do not discriminate against people with disabilities.

Title II of the ADA also requires that members of the public be notified of the rights and protections afforded them by the Americans with Disabilities Act [ADA Title II TAM, II-8.400]. Printed notification of these rights and protections were absent in all documents reviewed.

These omissions in written policies do not indicate actual discriminatory conduct by City of El Centro staff and do not indicate that City programs are being operated in a discriminatory manner. However, the aforementioned written policies should be developed and implemented to prevent inadvertent discrimination. Their absence may be due to the fact that, at the present time, the City of El Centro offers comparatively few programs and services. However, as the City grows and the number of services and programs it provides expands, these written policies will be critical to the equitable operation of City programs and services.

Recommendations Regarding General Nondiscrimination Policies Related to the Overall Operation of City Programs and Services

It is recommended that the City of El Centro develop and implement written policies which:

- ▶ prohibit discrimination against people with disabilities in the operation and administration of city programs and services;
- ▶ prohibit program, or service eligibility criteria that exclude or tend to exclude people with disabilities;
- ▶ provide for the development of written criteria and procedures for the assessment of a direct threat to the safety of others which may be occasioned by the participation of a specific individual with a disability in a particular City program, activity or service. These criteria must be based on factual information about the individual's actual disability, and not on rumors or generalized fears about disabilities;
- ▶ prohibits unequal opportunities and unequal or less effective services for people with disabilities;
- ▶ provide for the delivery of services and the operation of programs in integrated settings;
- ▶ provide for the modification of existing policies, practices and procedures when necessary to accommodate the needs of people with disabilities;

- ▶ prohibit the imposition of surcharges on people with disabilities to defray the cost of disability accommodations;
- ▶ prohibit discrimination against people with disabilities in the City's licensing, certification, and contracting policies, practices and procedures, and
- ▶ provide for notification of members of the public about the rights and protections afforded them by the Americans with Disabilities Act. Suggestions for means of disseminating this information to the public are contained in a later section of Part Three of this self-evaluation, "Providing Notice of ADA Rights and Protections."

General Nondiscrimination Findings Regarding City of El Centro Police Department Services and Programs

In addition to providing a full array of police services, the City of El Centro Police Department operates some community programs, such as the PAX program, a citizen's ride-along program, and (PAL) Police Athletic League. Policies and procedures for all of these programs were reviewed as part of this self-evaluation.

In general, it was found that these programs have been run in a nondiscriminatory manner.

However, it is highly recommended that El Centro Police Department Staff have disability awareness and disability etiquette training that is specifically geared to meet the unique and critical demands placed on police officers in the line of duty.

Any application forms for community programs that ask for information that can be used to screen out applicants who have disabilities must be modified. Screening out these applicants could be discriminatory and could constitute a violation of the Americans with Disabilities Act [28 CFR Section 35.130 (b)(8)].

Recommendations for Ensuring General Nondiscrimination in City of El Centro Police Services and Programs

- ▶ Conduct intensive disability awareness and disability etiquette training specifically geared to meet the needs of police officers on active duty.
- ▶ Modify any application forms for the PAX Program and the Citizen Observer Program to remove those items which ask about disabilities, and/or about individual's health histories.

Equally Effective Communication in City Programs, Activities and Services

Title II of the Americans with Disabilities Act requires public entities to ensure that their communications with applicants, participants and members of the public who have disabilities are as effective as their communications with others. To that end, Title II requires that public entities must make their visual, heard and spoken communication accessible to people with disabilities. This may include providing auxiliary aids and services to ensure effective communication.

Effective communication also must be provided in emergency situations, and evacuation procedures must be effectively communicated to people with disabilities in the event of an emergency. Structural features such as signage which is accessible to people who have visual impairments, and visual as well as auditory alarms, where alarms are provided, are necessary means to help ensure effective communication with people with disabilities who are using City facilities.

Findings Regarding Equally Effective Communication in City of El Centro Programs, Activities and Services

The City of El Centro staff communicate with the public utilizing a variety of means including: print material, telephone and fax, direct face-to-face spoken contact, and e-mail. The City also has a Web site which posts information about City activities and services, as well as job announcements.

While City of El Centro Department staff have indicated willingness to provide print materials (forms, notices, job announcements, brochures and other documents) to people with disabilities in alternative accessible formats such as large print, ASCII computer disk, audiotape or Braille, they have not yet had occasion to provide all documents in these formats. Consequently, at present there is no available supply of public documents in any of these formats, although they could be provided on request with advance notice.

Staff have, however, assisted people with disabilities in the process of filling out various application forms for utility services, building permits and other needs. They indicate a willingness to continue doing so in the future.

The City of El Centro currently has no TDDs (text telephones for individuals with hearing and speech disabilities) in most of its Departments, and City staff have not been trained in the use of TDDs, or in the use of the California Relay Service (CRS). This lack of equipment and training severely limits the ability of City staff to communicate with members of the public who are deaf or hard of hearing, or who have speech disabilities. Emergency 911 calls are handled by a police dispatcher who has a TTY.

Some deaf and hard of hearing individuals have been able to communicate with City staff in departments such as Building and Planning via the use of the Internet and e-mail. Hard of hearing members of the public are also able to request use of an available assistive listening system when attending El Centro Council or City Planning Commission meetings. This system is regularly maintained. Written policies and procedures for requesting it, and for its maintenance are set forth in the City of El Centro Policy Manual.

None of the physical facilities surveyed in the City of El Centro ADA Survey of Existing Facilities have adequate accessible signage, and none have either visual or auditory emergency alarms. No emergency evacuation procedures were in evidence among any of the written policies and procedures reviewed, and there were no provisions or training guidelines as how emergency evacuation would be conducted for anyone.

The general finding was that City of El Centro staff are very willing to assist people with disabilities with effective communication, but they have no written procedures or training about how to do so.

This willingness and need for training also extends to members of the El Centro Police Department. Some officers and staff members have personal experience with various disabilities, and have provided accommodations such as large print forms and the opportunity to tape record rather than write statements on a case-by-case basis. However, no written protocols for communication with individuals who have speech, cognitive or hearing disabilities, or for assisting individuals who are blind or have limited vision were available for review.

The City's lack of written policies concerning the provision of auxiliary aids and services to ensure effective communication has not led to any critical situation up to the present time. However, as the City of El Centro grows and more people with disabilities live in the area, it will become vitally necessary for these residents to communicate directly with City personnel via TDDs, qualified interpreters, documents in accessible formats, and via the City's Web site.

Some auxiliary aids and services, such as large print documents or tape-recorded brochures, can be provided inexpensively and on relatively short notice. Others, such as the services of a qualified interpreter or Braille transcriber, require several days' notice to arrange and require some form of finding allocation.

Recommendations for Providing Effective Communications in City of El Centro Programs and Services

- ▶ The City of El Centro should develop a written policy that commits the City to providing effective communications with people with disabilities in all of its programs, activities and services.

- ▶ The City should establish means of notifying the general public of its right to equally effective communication under the Americans with Disabilities Act. The notice that auxiliary aids and services are available to participants when participating in City programs, services and activities can accompany all announcements of public meetings. Such notices may also accompany mailings and other announcements to the general public. The notices should contain information about procedures for contacting appropriate City staff to request needed aids and services.
- ▶ The City should also develop a written policy for evaluating and fulfilling requests for communication aids and services. When the aid or service requested by an individual with a disability would present an undue burden for the City, procedures for providing an alternative effective aid or service should be specified.
- ▶ It would be extremely advantageous for the City to establish a fund or budget item to provide for such relatively costly communication needs as qualified interpreter services, Braille transcription, or real-time captioning.
- ▶ It is critically important that text telephones (TDDs) be provided in those City Departments that have the heaviest contact with the public, including the Utility Billing Department, Building Dept., Planning Dept., and the City Manager's office. Staff of these departments should receive appropriate training in how to use a TDD and in using the California Relay Service.
- ▶ A supply of the most frequently used forms and notices should be developed in large print and on computer diskette. This will be relatively easy to accomplish if forms and notices are already available on computer disk.
- ▶ If documents or brochures need to be tape recorded, City resources are already available to accomplish this task, since the minutes of City Council meetings are currently being tape recorded. The City must ensure that there is no charge when tapes are provided as disability accommodation.
- ▶ The City of El Centro Web site, which contains much valuable City information, should be modified to be fully accessible to people who have vision disabilities.
- ▶ Any emergency evacuation procedures should contain provision for how to communicate emergency information to people with vision, hearing and cognitive disabilities.
- ▶ City of El Centro staff should also receive disability awareness and disability etiquette training, to familiarize themselves with the most appropriate ways of assisting people with disabilities.
- ▶ El Centro Police Department staff can also receive training in appropriate procedures to use when communicating with members of the public who have speech, hearing, vision, cognitive, and other disabilities.

Program Accessibility for Individuals with Disabilities Using City Services and Programs

The City of El Centro as public entity, must ensure the programs, services and activities it offers are accessible to and useable by individuals with disabilities. Depending on the barriers encountered by people with disabilities when they attempt to use City services or participate in City programs, meeting the program accessibility standard may or may not involve making structural alterations to City buildings and facilities.

Other methods the City might utilize to achieve program accessibility include: relocating of a service to an accessible site, providing an aide to enable an individual with a disability to obtain a service, or purchasing or redesigning equipment.

Findings Regarding Program Accessibility for the City of El Centro

All City of El Centro staff interviewed for this self-evaluation indicated their willingness to provide assistance to people with disabilities and serve as aides to ensure program access, if needed.

Some structural modifications to City of El Centro buildings and facilities will be needed to ensure program access for people with disabilities. Suggestions for making the necessary structural alternations to buildings and facilities are contained in the attached document, the City of El Centro Transition Plan Recommendations. Also mentioned in this document are the need for signage which is accessible to people with disabilities in all City buildings and facilities, and the need for emergency alarms which have both visual and auditory signals in these buildings and facilities.

Recommendations for Providing Program Access to Individuals with Disabilities Using City of El Centro Services and Programs

- ▶ Make necessary structural modifications to existing City buildings and facilities. See the City of El Centro Transition Plan Recommendations for details.
- ▶ Provide necessary visual and auditory alarms and accessible signage as discussed in the City of El Centro Transition Plan Recommendations.
- ▶ Develop and implement a written policy requiring maintenance of accessible features in City of El Centro buildings, facilities, programs and services.
- ▶ Develop and implement a written policy requiring program accessibility in buildings and facilities that are leased by the City of El Centro.

- ▶ Develop a budget item for purchase of equipment, as needed. Examples of this equipment include, but are not limited to: wheelchair lifts, computers, tape recorders, copiers, sound amplification systems, captioning equipment, magnifying lenses, and high intensity lamps.
- ▶ Provide appropriate disability awareness and disability etiquette staff training to City of El Centro staff, so they can effectively aid people with disabilities.

Findings Pertaining to Employee Recruitment, Job Applicants and New Hires

Currently, job announcements are listed in newspapers and sent to a variety of government agencies and community groups. No recruitment has been targeted to agencies or organizations that provide employment services to individuals with disabilities. While it is not required, it is consistent with the purpose of the ADA for employers to expand their outreach to include sources of qualified job candidates with disabilities.

Job announcements are also posted on the City of El Centro Web site. This material is inaccessible to those individuals who use screen reading software (i.e. persons who have vision disabilities or learning disabilities) as it is formatted in a graphic environment.

A sample of City of El Centro job announcements were examined to ensure that the content is nondiscriminatory and accurately portrays the essential functions of the job. None of the announcements reviewed contained discriminatory language. They appropriately listed the essential job functions of the position being advertised.

The ADA specifically prohibits any pre-employment inquiries about a disability on application forms, in job interviews, and in background or reference checks [EEOC ADA Title I TAM, V-3]. It is not permissible to ask questions regarding the existence of an applicant's disability or the nature or severity of the disability, or questions that constitute medical inquiries.

The ADA also addresses the issues of medical examinations. It states that an employer may not require a job applicant to take a medical examination to respond to medical inquiries prior to making a job offer.

Title I issues may be fully addressed under a separate consultant agreement.

Administrative Requirements

As discussed in Part II of this report, three administrative actions are required of a public entity in addition to the Title II requirements to conduct a self-evaluation and, if necessary, develop a transition plan. These three Title II requirements are:

- to designate a responsible employee as ADA Coordinator;
- to provide notice of ADA requirements; and
- to establish a grievance procedure.

Designating a Responsible Employee to Coordinate ADA Compliance

Any public entity with fifty or more employees must designate at least one employee to coordinate ADA compliance. The ADA Coordinator role includes: planning and coordinating overall compliance efforts, and receiving and investigating grievances about programs, services, practices, and employment.

Title II requires that individuals must be able to easily identify the ADA Coordinator and know how to contact him.

Findings

The City of El Centro has designated Mr. Kenneth G. Skillman III, P.E., LS, as Coordinator. However, it does not appear that the appropriate steps have been undertaken to notify the public.

Recommendations Regarding Designating a Responsible Employee

- ▶ The City of El Centro must provide the ADA Coordinator's name, office address, and telephone number to the general public. This can be done through the notice described below.

Providing Notice of ADA Rights and Protections

All public entities must provide information to applicants, participants, beneficiaries, employees, and other interested parties about the rights and protections afforded by Title II of the ADA. The head of the public entity can determine the most effective methods for making individuals in the community aware of their rights and protections.

Findings

The City of El Centro provides some notice of ADA requirements and City Council Agendas include notice of ADA requirements.

However, public notice of ADA rights and protections is not sufficiently and consistently provided by the City of El Centro.

Recommendations Regarding Providing Notice of ADA Rights and Protections

The City of El Centro should, on an on-going basis, provide information to the public about the rights and protections afforded by the ADA. Some methods that the City might use to provide this information include:

- publication of notice of ADA requirements in public notices, job announcements, and any brochures which describe the City's programs, activities or services;
- a display of informative posters in City Hall and the City Council Chambers; a display of information on the City of El Centro Web site;
- announcements regarding ADA rights and protection on radio, and/or captioned television public service announcements.

In order to ensure effective communication, it is advisable that the notice of ADA requirements be presented in clear, straightforward English and Spanish. A sample English notice is provided in the appendices of this report (See Appendix A).

Establishing a Grievance Procedure

All public entities with 50 or more employees must adopt and publish grievance procedures providing for prompt and equitable resolution of complaints alleging any action that would be prohibited by Title II. The Title II regulations do not stipulate the steps of these grievance procedures. A public entity may use a grievance procedure that is already in place.

A sample "Municipal Grievance Procedure" form is included as Appendix "B".

Appendix A

Sample Notice

Public Notice of the availability of the draft of the proposed rulemaking is provided to all interested parties. The draft of the proposed rulemaking is available for review and comment on the following dates and times:

The draft of the proposed rulemaking is available for review and comment on the following dates and times:

Comments should be submitted to the City of El Centro, California, at the following address: City of El Centro, California, 1234 Main Street, El Centro, California 92521.

Appendices

Appendix A:

Sample Notice

(Public Entity) does not discriminate on the basis of disability in admission to, access to, or operations of its programs, services, or activities. (Public Entity) does not discriminate on the basis of disability in its hiring or employment practices.

This notice is provided as required by Title II of the Americans with Disabilities Act of 1990.

Questions, concerns, complaints, or requests for additional information regarding the ADA may be forwarded to (Public Entity's) designated ADA Compliance Coordinator.

Name: _____

Title: _____

Office Address: _____

Phone Number: Voice _____ TDD _____

Days/Hours Available: _____

Individuals who need auxiliary aids for effective communication in programs and services of (Public Entity) are invited to make their needs and preferences known to the ADA Compliance Coordinator.

This notice is available in large point, on audio tape, and in Braille, from the ADA Compliance Coordinator.

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ADA Title II Action Guide, Boston: Adaptive Environment Center, © 1996.

Appendix B: Sample Municipal Grievance Procedure

This Grievance Procedure is established to meet the requirements of the Americans with Disabilities Act. It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in employment practices and policies or the provision of services, activities, programs, or benefits by (Name of Municipality).

The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number of complainant and location, date, and description of the problem. Alternative means of filing complaints, such as personal interview or a tape recording of the complaint, will be made available for persons with disabilities upon request.

The complaint should be submitted by the grievant and/or his or her designee as soon as possible but no later than 60 calendar days after the alleged violation to:

(Name of ADA coordinator)
(Phone Number)
(Address)

Within 15 calendar days after receipt of the complaint, (Name of ADA coordinator) will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, (Name of ADA coordinator) will respond in writing, and, where appropriate, in a format accessible to the complainant, such as large print, Braille, or audio tape. The response will explain the position of (Name of Municipality) and offer options for substantive resolution of the complaint.

If the response by (Name of ADA coordinator) does not satisfactorily resolve the issue, the complainant and/or his/her designee may appeal the decision of the ADA coordinator within 15 calendar days after receipt of the response to the mayor or his or her designee.

Within 15 calendar days after receipt of the appeal, the mayor or his or her designee will meet with the complaint to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting the mayor or his or her designee will respond in writing and, where appropriate, in a format accessible to the complainant, with a final resolution of the complaint.

All written complaints received by (Name of ADA coordinator), appeals to the mayor or his or her designee, and response from ADA coordinator and mayor his or her designee will be kept by (Name of Municipality) for at least three years.

Self-Evaluation and Checklist

1. The following items are designed to help support policy with the following:

1. The following items are designed to help support policy with the following:

Appendix “C”

The following items are designed to help support policy with the following:

The following items are designed to help support policy with the following:

Sample Self-Evaluation and Checklist Form

The following items are designed to help support policy with the following:

The following items are designed to help support policy with the following:

The following items are designed to help support policy with the following:

Self-Evaluation and Checklist

The following forms are designed to help recipients comply with their responsibilities to conduct self-evaluations under Section 504 of the Rehabilitation Act. Included in this section are a self-evaluation checklist, an employment assessment tool and a communications accessibility tool, which can be used as part of the self-evaluation process as a whole.

The forms help recipients focus on key issues that could affect the accessibility of their programs and practices. They ask questions concerning the type of programs offered, any eligibility criteria, the availability of auxiliary aids, and the presence of physical or other barriers. Access to facilities and employment issues are also addressed.

This self-evaluation is not “official,” in that it was not prepared by a federal agency (the government-wide regulations do not prescribe a specific form). However, by completing it, recipients can identify those policies and practices that comply with section 504 and those that do not. The form also can help recipients organize their compliance efforts for policies and practices that do not meet the section 504’s non-discrimination mandate.

This form can also be used to conduct a self-evaluation for purposes of the Americans with Disabilities Act.

Subscribers to the *Section 504 Compliance Guide* can make photocopies of the self-evaluation in the appendix for purposes of section 504 and ADA compliance. Photocopying for other purposes, or by other persons, is prohibited without written permission from the publisher.

Self-Evaluation**Self-Evaluation Checklist**

Person Completing This Form: _____

Department: _____

Program, Activity or Service: _____

A. Participation of Disabled Persons

List steps taken to ensure that disabled persons (or their representatives) participate in the completion of this self-evaluation.

B. Nature of Program

Describe, in general, the nature of the program, including its purpose, scope, general activities and participants.

C. Recruitment and Advertisement

1. Does the recipient engage in any of the following activities to recruit program participants, or otherwise inform persons of the program's existence? If **no**, proceed to Item D.

Describe briefly activities involved and materials used.

List steps to ensure accessibility and opportunities for full participation by disabled persons.

Describe approaches to ensure effective communications with persons with vision and hearing impairments (e.g., provision of auxiliary aids or presentation of materials in alternative formats).

List steps to ensure inclusion of a notice of the recipient's compliance with section 504 (or the ADA) in all materials and advertisements.

Meetings or Oral
Presentations

Printed Recruitment
Materials

Advertisements

Other (specify)

2. Turn to section "G" (Outside Persons and Organizations) on Page 11. List there any "outside" persons and organizations involved in these recruitment, advertising or information efforts.

3. Turn to section "H" (Facilities Used) on Page 12. List there all facilities, and parts of facilities, used during recruitment and advertising efforts, including those not owned and/or operated by the recipient (e.g., leased or otherwise used). Are these facilities accessible? If not, is information available in an accessible location?

D. Program Eligibility Requirements and Admission

1. Are there any limitations on the number of qualified disabled persons who may participate in or be admitted to the program?

☐ No

☐ Yes

If **no**, proceed to "2" below.

If **yes**, list steps to be taken to eliminate the limitation(s).

2. Are any criteria or tests used in the admission process?

☐ No

☐ Yes

If **no**, proceed to "7" below.

If **yes**, list and describe briefly all criteria (e.g., good health, residency requirements, letters of recommendation) and all tests (including the skill, level of achievement, or other factors being tested, whether they are written or oral tests, the method of administration) used in the admissions process, and indicate how they relate to the program.

3. List all criteria and tests from "2" above that have (or could have) a disproportionate, adverse impact on disabled program applicants. Discuss briefly the (potential) negative impact for each.

4. For each criterion or test listed in "3" above that you design and administer, discuss briefly **alternative** criteria or tests that will be used to ensure non-discrimination. This would include, in limited instances, not using a criterion or test.
5. For each item listed in "3" above that is designed and/or administered by an "outside" person or organization, list steps to modify any criterion or test that has a (potential) disproportionate, adverse impact on disabled persons, or class(es) of disabled persons (including, in limited instances, not using a criterion or test).
6. List steps to be taken to make potential program participants, including those with hearing and vision impairments and learning disabilities, aware of alternative testing and criteria.
7. Is an interview required before an applicant enters the program?
☐ No ☐ Yes
If **no**, proceed to "8" below.
If **yes**, discuss briefly the interview process and list steps to be taken (including the provision of auxiliary aids, as required) to ensure non-discrimination in interviewing.

8. Are any forms required for admission in the program, testing or submission of other admissions criteria?

☐ No

☐ Yes

If **no**, proceed to "11" below.

If **yes**, what are the forms, and are any available in alternative formats (e.g., taped, braille, reader available)?

9. List steps to provide admission forms in alternative formats.

10. Do the forms listed in "8" above contain a notice of your organization's compliance with section 504 (or the ADA)?

☐ No

☐ Yes

If **yes**, proceed to "11" below.

If **no**, list steps to ensure the inclusion of notices of your compliance with section 504 (or the ADA) in all materials.

11. List steps to ensure that applicants are not asked pre-admission inquiries as to the nature and extent of a disability, and that no forms or other written materials make mandatory inquiries related to disability.

12. Turn to section "G" on Page 11. List there any "outside" persons and organizations involved in testing, collecting or evaluating admissions criteria.
13. Turn to section "H" on Page 12. List there all facilities, and parts of facilities, used for testing, collecting or submitting forms and admissions criteria, and other activities related to program eligibility requirements, including facilities not owned or operated by the recipient (e.g., leased or otherwise used).
14. Are these facilities accessible to people with disabilities, including people who use wheelchairs? If not, is an alternative, accessible location available?

E. Participation in the Program

1. Are post-admission inquiries made regarding disabled status to make accommodations for disabled persons?

☐ No

☐ Yes

If **no**, proceed to "2" below.

If **yes**, list steps to ensure that information is gathered voluntarily, not used to affect any disabled person adversely, and kept confidential.

2. Is there an orientation for new participants?

☐ No

☐ Yes

If **no**, proceed to "3" below.

If **yes**, describe briefly the orientation and materials used, and list steps to ensure effective communications and usable materials (in alternative formats) for all participants.

3. List below all written materials, tools, equipment or other aids or devices used for the program.

4. For each item in "3" above, list steps (e.g., the provision of auxiliary aids, equipment modification) to ensure that program materials and equipment are accessible and usable.

5. Would any steps pose an undue financial or administrative burden?

☐ No

☐ Yes

If yes, list alternative methods of providing accessibility that would not impose an undue financial or administrative burden.

6. What elements or activities are included in the program?

7. For each element in "6" above, which ones are, or have the potential to be, inaccessible to disabled participants? Describe steps to make them accessible and usable (e.g., the provision of auxiliary aids, use of alternative materials or formats).

8. Are any of the following services or benefits provided to program participants? (If none is provided, proceed to "9.")

☐ Transportation Services	☐ Counseling Services
☐ Health Services and Insurance/Benefits	☐ Employment Services
☐ Housing	☐ Food Services
☐ Financial Aid	☐ Social, Recreational or Athletic Activities

List steps to ensure that:

- Service/benefit is equally effective for and usable by disabled persons;
- Administration of service/benefit will be free from discrimination based on disability;
- Communications will reach all persons (including those with hearing and sight impairments); and
- Effective application procedures to receive the services exist for disabled persons (including those with hearing and vision impairments).

9. List steps to ensure that information concerning program schedules and activities are effectively communicated to all program participants, including those with impaired vision and hearing.

10. Are there boards, councils or similar bodies on which program participants sit?

☐ No

☐ Yes

If **no**, proceed to "11" below.

If **yes**, list steps to ensure equal opportunities for selection to, and participation in, such boards by disabled persons.

11. Turn to section "G" on Page 11. List there any "outside" persons or organizations involved in any aspect of the program.

12. Turn to section "H" on Page 12. List there all facilities, and parts of facilities, used during the program, including those not owned and/or operated by the recipient (e.g., leased or otherwise used).

13. Are these facilities accessible to people with disabilities, including people who use wheelchairs? If not, is the program, "when viewed in its entirety," accessible?

☐ No

☐ Yes

If **no**, what steps will be taken to make it accessible? (If structural changes are necessary for buildings the recipient owns or operates, see transition plan in Appendix VII.)

F. Staff Information

List steps to ensure that all staff involved in this program (e.g., recruitment, admission, testing, the conduct of the program, the provision of any services or benefits) will be informed periodically of, and understand fully, your policy of non-discrimination on the basis of disability.

G. "Outside" Persons and Organizations

1. List below all "outside" persons and organizations that are involved in the provision of any aid, benefit or service for the program (as discussed in sections "C" through "E" above). Include secondary recipients in your discussion.

2. List steps to inform those listed in "1" above of your organization's commitment to non-discrimination on the basis of disability.

3. List those persons and organizations from "1" above that receive "significant assistance" from your organization in the provision of aids, benefits or services to your program participants. (For example, list organizations which rent or otherwise use your facilities; that depend on your organization for informing its participants of the aid, benefit or service; that have employees of your organization spending time to assist in or coordinate the provision of the aid, benefit or service; and so forth.)

- relationship.)

H. Facilities Used

(NOTE: The definition of “facility” under section 504 includes all or any portion of buildings, structures, equipment, roads, walks, parking lots or other real or personal property or interest in such property, owned, operated or leased.)

1. List below all facilities, or portions of facilities, used for the activities covered in sections "C" through "G" above, designating for each the activity for which it is used. (NOTE: Facilities leased or otherwise used from another person or organization should be included.)
2. Using the Uniform Federal Accessibility Standards,* list below for each facility (or portion thereof) inaccessible features that limit program accessibility.

* Located in Appendix V.

3. List steps to ensure that all future construction and renovation work will comply with the architectural accessibility standards.
4. List steps to ensure periodic communications with (potential) disabled program participants concerning accessible and inaccessible facilities.
5. Using information from "1" above:
List non-structural measures that will be taken to ensure accessibility when the program is "viewed in its entirety," including:
- (a) relocating the activity to accessible space;
 - (b) being able to relocate the activity to accessible space, upon notice of the needs of a qualified disabled person;
 - (c) revising the structure or format of the activity so the space is not needed;
 - (d) modifying or redesigning equipment;
 - (e) making home visits or other alternative delivery services; or
 - (f) otherwise achieving program accessibility.
6. Is the facility in question considered "historic" (e.g., is it either on National Register of Historic Places or on a state or local list of historic places)?

☐ No☐ Yes

If yes, list steps to ensure program accessibility, including any structural changes. If structural changes would compromise the historic value, list alternative methods to ensure program accessibility.

I. Federal Contractors

1. Do you have one or more federal (sub) contract(s) of \$10,000 or more?

☐ No

☐ Yes

If **no**, proceed to (3).

If **yes**, describe procedures that will be followed to comply with all requirements of section 503, and to ensure that personnel policies, practices and procedures are consistent with standards in section 503 (see Tab 700).

2. Do you have one or more federal (sub)contract(s) of \$50,000 or more?

☐ No

☐ Yes

If **no**, proceed to (3).

If **yes**, describe the process whereby a formal affirmative action program will be designed and implemented according to section 503 guidelines (see Tab 700).

3. Describe steps that will be taken to become familiar with the hearing and enforcement procedures under Title VI of the Civil Rights Act of 1964, which are also applicable under section 504 (see Tab 800).

Employment Assessment Tool

The following guidelines have been prepared to assist public entities in their compliance with the employment provisions of section 504 and/or the ADA. They may be used during the initial self-evaluation process and ongoing future efforts to ensure non-discrimination in employment on the basis of disability.

The "Employment Assessment Tool" is based on requirements contained in both the government-wide regulations issued under section 504 and the ADA title I requirements.

DATE: _____

PERSON COMPLETING THIS FORM:

(name)

(title)

(address)

(telephone)

1. Discuss safeguards to ensure that all employment decisions are made without discrimination on the basis of disability, and that such decisions do not limit, segregate or classify applicants or employees based on disability in a way that adversely affects their opportunities or status.

2. Describe procedures to ensure that formal relationships regarding employment (e.g., those with labor unions, employment agencies, etc.) do not have the effect of discriminating against qualified disabled persons.

- recruiting, advertising and processing applications for employment;
- hiring, upgrading, promotion, award of tenure, demotion, transfer, layoff, termination, right of return from layoff, and rehiring;
- rates of pay or any other form of compensation and changes in compensation;
- job assignments, job classifications, organizational structures, position descriptions, lines of progression, and seniority lists;
- leaves of absence, sick leave or any other leave;
- fringe benefits available by virtue of employment, whether or not administered by the recipient;
- selection and financial support for training, including apprenticeship, professional meetings, conferences and other related activities, and selection for leaves of absence to pursue training;
- employer-sponsored activities, including social and recreational programs; and
- any other term, condition or privilege of employment.

6. Describe methods to identify the job-related characteristics of tests and criteria used in employment decisions, since job-related tests are permitted even if they screen out disabled persons.
7. Describe steps to ensure that no pre-employment inquiries are made as to whether an applicant is a disabled person or as to the nature or severity of a disability. (Inquiries related to one's ability to perform a job effectively and safely are permitted.)
8. Does your organization conduct or require any medical exams after making conditional offers of employment?

☐ No☐ Yes

If yes, describe procedures to ensure that (a) **all** entering employees in that position are subject to medical exams, (b) all offers of employment are conditional based on the results of the exams, (c) the medical results gathered are not used in a discriminatory manner, and (d) all information gathered is kept confidential.

9. Review job application forms and interview questions to ensure that applicants are not asked about the existence of (or nature or severity of) a disability. You are allowed to inquire about the candidate's ability to perform job functions.

Ensure that applicants are not asked about their relationship or association with a disabled individual.

10. Review existing job description forms or complete a "Position Description Form" for each job position in your organization for use in determining "qualified" applicants and what job accommodations can be made when necessary for an applicant or employee.

11. Determine the essential and marginal functions of job positions in your organization.

Communications Accessibility Checklist

Section 504 does not require recipients to specifically make communications accessible. However, under Title II of the ADA, public entities must provide communication accessibility to people with hearing, visual and speech impairments (see Tab 1000 for a full discussion). However, those entities combining their section 504 and ADA compliance efforts may wish to include this portion in their self-evaluation. This form, *which should be used in conjunction with the general self-evaluation*, highlights the requirements of the ADA's title II rule. It is also intended to help recipients identify areas to be made accessible and outline steps to comply with the communications provisions of the ADA.

1. Provision of Auxiliary Aids

List auxiliary aids that are available (or sources where they can be obtained) for individuals with speech, vision or hearing impairments. This can include qualified readers and interpreters, taped, brailled or large-print materials, or closed-captioned video programs.

2. Are auxiliary aids provided to individuals with hearing, speech or vision impairments when needed to ensure effective participation in a program or activity? If no, list steps to ensure that auxiliary aids are provided to overcome communication barriers.

3. Teletypewriters

Does the recipient provide services or information to the general public over the telephone?

If **yes**, is a teletypewriter (TTY — also referred to as a telecommunication device for the deaf) or other equally effective system available so that public entities can communicate with hearing- and speech-impaired individuals?

If **no**, list steps to ensure effective communications with hearing- and speech-impaired individuals. This can include providing a TTY or relying on a third-party relay service. Note: the Justice Department encourages public entities that have extensive phone contact with the public to have TTYs to assure more immediate access.

4. "911" Emergency Services

Are all "911" emergency response service equipped with a (TTY) or other equally effective technology to make the service accessible to hearing- and speech-impaired individuals? Note: separate, seven-digit phone numbers and/or reliance on a third-party relay service is *not* an acceptable alternative for making 911 services accessible.

5. Information and Signage

Is information provided concerning the following?

- Signage at inaccessible entrances directing people to an accessible entrance or a location with information about an accessible entrance.
- Signage concerning the availability and location of TTY-equipped pay phones or portable TTYs.

[The next page is Appendix VII, Page 1.]

TABLE OF CONTENTS

EXECUTIVE/NOADA DISCUSSIONS - TITLE II

ADA Discussion

Overview

Summary

Public Participation

CITY OF EL CENTRO

CITY OF EL CENTRO ADA POLICY, PROGRAMS & PLAN

Introduction

Policy

ADA Program

Public Access

TRANSITION PLAN RECOMMENDATIONS

2012-2013 ACTION PLAN

Complete Transition Plan

PUBLIC PARTICIPATION

Public Access

Public & Community

Community Outreach

FACILITY SURVEY & REMEDIATION

Facility & Public Access to Services

Development of Accessibility & Service Request Form

REPORTS

Annual Report

Annual Report Form & Checklist

Annual Report Form

Prepared by:

Equal Access, Inc.

TABLE OF CONTENTS

1.	BACKGROUND ADA REQUIREMENTS - TITLE II	1
	ADA Requirements	2
	Milestones	3
	Enforcement	3
	Public Participation.....	3
2.	CITY OF EL CENTRO ADA POLICY, PROGRAM & PLAN	4
	Responsibilities & Official Responsibility for Plan	4
	Policy	4
	ADA Program.....	5
	Barrier Removal Plan Components	6
3.	SELF-EVALUATION	8
	Emergency Evacuation Plan.....	8
4.	PUBLIC PARTICIPATION	9
	Notification	9
	Review & Comments.....	9
	Grievance Procedure.....	9
5.	FACILITY SURVEYS & BARRIER REMOVAL	10
	Department & Public Review of Identified Barriers & Development of Accessibility & Barrier Removal Plan.....	10
6.	SURVEYS	11
	About the Survey	11
	Survey Scope of Work & Objectives.....	11
	Services to be Provided.....	11

Table of Contents Continued

7. ACCESSIBILITY STANDARDS AND LIST OF BARRIERS.....	13
“Accessible” Defined.....	13
Program Accessibility.....	13
Undue Burden	13
Identification of Barriers	14
 8. METHODS FOR REMOVAL OF BARRIERS	16
 9. FUNDING SOURCES	18
 10. REFERENCES	19

1. BACKGROUND: ADA REQUIREMENTS - TITLE II

The Americans with Disabilities Act (ADA), passed on July 26, 1990, provides a comprehensive mandate for elimination of discrimination against individuals with disabilities. The Titles of the Act are as follows:

- I. Employment
- II. Public Services and Transportation
- III. Public Accommodations and Services
- IV. Telecommunications
- V. Miscellaneous

Title II of the Act prohibits discrimination by public entities on the basis of disability in the provision of and access to services, programs and activities. By reference to Title I, it prohibits discrimination in employment as well.

This legislation, together with provisions of the Rehabilitation Act of 1973, prohibits discrimination via architectural barriers in:

- existing facilities, and
- construction of new facilities.

"Facilities" means buildings, portions of buildings, sites, and site improvements.

Under the ADA the CITY OF EL CENTRO (CITY) is obligated to remove physical barriers to accessibility when program changes cannot ensure access to services, programs and activities provided in existing facilities. The CITY is required to construct new facilities and alterations to existing facilities to be accessible to persons with disabilities. The CITY must provide services, programs and activities in the most integrated setting possible.

The findings and purposes of Congress as reported in Section 2(a) of the Act state that "historically, society has tended to isolate and segregate individuals with disabilities," that "discrimination against individuals with disabilities persists in such critical areas as employment ... health services, and access to public services" and that "individuals with disabilities continually encounter various forms of discrimination, including ... the discriminatory effects of architectural ... barriers, failure to make modifications to existing facilities, . . segregation, and relegation to lesser services, programs, activities. . . ." The findings also state that the "Nation's proper goals regarding individuals with disabilities are to assure equality of opportunity, full participation, independent living, and economic self-sufficiency for such individuals...."

Any continued discrimination on the basis of disability via the effects of architectural barriers in CITY facilities:

- limits equality of opportunity, full participation, independence and self-sufficiency of CITY residents and visitors with disabilities.
- places the CITY at risk of liability;

ADA Requirements

ADA requires that the CITY identify and remove barriers to employment and public services, programs and activities. Federal Register 28 CRF Part 35 instructions state that "in the event that structural changes to facilities will be undertaken to achieve program accessibility, a public entity that employs 50 or more persons shall develop, within six months of January 26, 1992, a transition plan setting forth the steps necessary to complete such changes."

ADA further requires that the plan "shall, at a minimum -

- (i) identify physical obstacles in the public entity's facilities that limit the accessibility of its programs or activities to individuals with disabilities;
- (ii) describe in detail the methods that will be used to make the facilities accessible;
- (iii) specify the schedule for taking the steps necessary to achieve compliance with this section and, if the time period of the transition plan is longer than one year, identify steps that will be taken during each year of the transition period;
and
- (iv) indicate the official responsible for the plan.:

ADA also provides regulations establishing standards for accessible design; Americans with Disabilities Act Accessibility Guidelines (ADAAG).

Milestones

Three major milestones were established under Title II. The first milestone, a "Self-evaluation" of CITY policies and practices, was due on January 26, 1993.

The second milestone required the CITY to prepare a "transition plan" by July 26, 1992 outlining those physical changes to CITY facilities necessary to make services, programs and activities fully accessible. Physical implementation of the plan was to have been completed by January 26, 1995.

A lack of funding has been a major hurdle in meeting deadlines. An equally important factor is the number, diverse type, geographical dispersion, and age of facilities.

The ADA does not include a minimum annual ADA funding requirement.

Enforcement

Title II is enforced by complaint to the U.S. Department of Justice, and by review by or complaint to designated responsible federal (funding) agencies. Federal agencies may terminate funds to a program that is found to discriminate, or may refer that program to the Department of Justice for judicial enforcement. There is also a private right of action for persons with disabilities with the possibility of injunctive relief, and provision for alternate dispute resolution.

Public Participation

As part of an entity's compliance responsibilities, the entity must solicit the participation and comment of interested persons including those with disabilities.

2. CITY OF EL CENTRO ADA POLICY, PROGRAM & PLAN

Responsibilities & Official Responsibility for Plan.

The Title II implementing rule requires that a public entity appoint at least one employee responsible to coordinate the entity's efforts to comply with and carry out its ADA responsibilities. The City of El Centro employee responsible for ADA compliance is:

Kenneth G. Skillman III, PE, LS
City Of El Centro
1275 Main Street
El Centro, CA 92243

POLICY:

The City Of El Centro has promulgated two policies defining its direction in support of ADA dealing with one (1) Employment Provisions and two (2) Accessible Programs and Facilities. The accessible programs and facilities policy address Title II of the Act. The City is committed to eliminating discrimination on the basis of disability in providing services, programs and activities and to making City facilities accessible.

It is the Policy of the City Of El Centro to:

- Provide services, programs and activities in locations and facilities which are accessible.
- Ensure that new construction, alterations and additions to existing facilities are designed in compliance with the standards promulgated under the ADA and with California Code of Regulations, Title 24.
- Ensure that new acquisition lease facilities are accessible or can be made accessible.
- Make a good faith effort to comply with the administrative requirements of the ADA to prepare a transition plan which identifies details and schedules physical changes which must be made to facilities in order to provide access for individuals with disabilities to city services, programs and activities.
- Make a good faith effort to implement the physical changes identified in the transition plan.
- Consult the disability community in making decisions regarding the priority of physical changes and decisions regarding program access and equivalent facilitation.

- Ensure that program changes made in lieu of physical changes achieve an equivalent level or greater level of access.
- Direct that nothing contained in this policy requires the CITY to take any action which would threaten or destroy the historic significance of an historic property.
- Direct that nothing contained in this policy requires the CITY to take any action which would result in an undue fiscal or administrative burden as defined by the ADA. In determining whether financial or administrative burdens are undue, all CITY resources available for use in the funding and operation of the service, program or activity will be considered.
- Establish a complaint procedure whereby individuals with disabilities who believe that they have been discriminated against, may make known their grievances and seek relief.
- Ensure that communications with applicants, participants and members of the public with disabilities are as effective as communications with others.

The ADA Coordinator shall include in the Administrative Manual those procedures required for implementation of the policy. Each Department Head shall establish the necessary internal procedures to ensure compliance with the provisions of the policy and the Administrative Manual.

ADA Program

The CITY OF EL CENTRO ADA Program is comprised of five activities:

- 1) determining the extent of work needed to meet regulations through surveying CITY facilities,
- 2) developing a detailed barrier removal plan to accomplish required programmatic and structural changes,
- 3) implementing construction projects for barrier removal,
- 4) reviewing ADA requirements for all new construction, remodel projects, and
- 5) interpreting changes in the regulations and determining CITY accountability.

Barrier Removal Plan Components

There are five consecutive steps to preparing a barrier removal plan for each site or "element." These are:

- (i) survey of the facility and site to identify physical barriers that limit program accessibility;
- (ii) site occupants and ADA Coordinator review of identified barriers and selection of methods to be pursued to make programs and services accessible;
- (iii) development of a plan, funding source and schedule to achieve accessibility;
- (iv) public review and comment and
- (v) approval by ADA Coordinator

(i) Facility Survey

The identification of physical building features not in compliance with ADA requirements is the first step in the development of a barrier removal plan. ADA Standards for Accessible Design (ADAAG) and California Title 24 are used as criteria. These standards provide accessibility for a wide range of disabilities including wheelchair use, vision and hearing disabilities, limited upper body strength and grasping ability and other mobility disabilities.

(ii) Site Occupants Review

Once a survey is completed it will be reviewed by the Site Administration. All questions and/or comments will be communicated to the ADA Coordinator.

(iii) Detailed Barrier Removal Plan

Both site occupants and public input will be used to develop a detailed barrier removal plan for each facility or element. The ADA Coordinator will lead this effort; identify costs and a timetable and will oversee implementation of barrier removal once funding is appropriated by the ADA Coordinator or through the annual budget process.

(iv) Public Review and Comment

Public notice will be posted in the local newspaper, and copies of the surveys will be available to the public for review and comment.

(v) Approval by the 504/ADA Coordinator

The ADA Coordinator after reviewing the barrier removal plan and the public comments will be responsible for approving the plan as submitted or with modifications.

3. SELF-EVALUATION

A "self-evaluation" of CITY policies and practices, as described in Chapter 2 Milestones has been completed. Self evaluation survey forms completed by all CITY OF EL CENTRO departments are available for inspection at the CITY OF EL CENTRO Administration Offices.

Emergency Evacuation Plan

Information regarding emergency evacuation procedures for individuals with disabilities can be found in the Emergency Procedure Manual available at the CITY.

4. PUBLIC PARTICIPATION

Notification

Federal Register 28 CFR Part 35 states that a "public entity shall provide an opportunity for interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the development of the CITY transition plan by submitting comments." To comply with this requirement the CITY created the ADA Coordinator. This Coordinator has been designated as the official forum for public review of CITY OF EL CENTRO activities and plans related to ADA. The public may give input and comment on matters related to ADA either to the Coordinator or at any regularly scheduled public meeting which contains items related to the ADA on the published agenda.

Review & Comment

The Draft Report for each facility survey and the resultant barrier removal plan will be submitted to ADA Coordinator for formal public review and comment upon completion of the reports. Hard copies of all documents will be transmitted to the ADA Coordinator.

A complete set of reports will be available to the public through the ADA Coordinator's office. The reports will not include a complete listing of disability related architectural features of facilities. Renovations and improvements already made to facilities after the date of survey may not be included as part of the Transition Plan.

A copy of the Draft Reports shall be made available for public inspection during a formal citizen review period, during which interested persons, including individuals with disabilities or organizations representing individuals with disabilities, may participate in the development of a Transition Plan by submitting comments and making specific recommendations.

The City of El Centro's practice has always been, and will continue to be, to work with individuals to find a mutually acceptable way to mitigate barriers to existing programs and facilities. The Transition Plan is intended to serve as a step toward achieving this goal.

Grievance Procedure

Unlike state and local building codes, there is no procedure in the ADA for a public entity to receive a formal exception or hardship determination before a Transition Plan is adopted. The standard for federal enforcement is to act on complaints from the public. The public component of the Transition Plan will provide an indication of complaints or other specific concerns, and is an important aspect of ADA compliance.

5. FACILITY SURVEYS & BARRIER REMOVAL

The Building Department has been tasked with the responsibility of identifying architectural barriers, and coordinating the "transition plan" for achieving compliance with the "existing facilities" provisions.

The Building Dept. is also responsible to ensure that all new construction and alteration projects are accessible and fully code-compliant, and that "path of travel" improvements to altered areas are carried out in compliance with the ADA regulations and California Title 24 code.

The results of the ADA Surveys (see Sec.6) will be used by the CITY OF EL CENTRO to develop a barrier removal plan in each facilities. The plan will identify which barriers will be removed at what cost and in what time frame.

Departmental & Public Review of Identified Barriers Development of Accessibility & Barrier Removal Plan

After physical barriers are identified through the ADA field surveys and the Building Dept. completes a summation of barriers for each facility, survey "finding" documents (Draft Reports) are forwarded to the ADA Coordinator, and occupant sites for processing. Review will be made to determine which barriers may be negated and program access accommodated through operational change versus those barriers where access may only be accommodated through structural change.

Public comments will be submitted to the ADA Coordinator and their recommendations regarding Draft Report sufficiency, proposed programmatic access and structural accommodation will be returned to the Building Dept. for response including final cost estimating and a proposed schedule for building modifications.

6. SURVEYS

Under federal regulation, the CITY OF EL CENTRO's transition plan must identify physical obstacles in its facilities that limit the accessibility of its programs and detail methods to be used in making the facilities accessible.

About the Survey

The purpose of the survey is to identify physical features which may be barriers to persons with disabilities. Buildings and sites are surveyed for conformance with the Americans with Disabilities Act Accessibility Guidelines (ADAAG) and the accessibility requirements of California Title 24 (T-24). These standards provide recognized criteria for accessibility for people with varying types of physical disabilities, and are the standards for new construction and alteration in California.

The scope of the survey is limited to areas that are routinely available the general public, or prospective employees. The Department of Human Resources under the provisions of Title I of the ADA address current employee access issues.

The scope includes the route of travel from the public way, parking, building entrances, signage, the route of travel on site, doors, vertical circulation, public offices and service counters, sanitary facilities, drinking fountains, telephones, and fire alarms.

Facilities that are found to have no public usage will not be surveyed.

Survey Scope of Work and Objectives

The scope of the Survey is to identify architectural barriers to accessibility.

The objective of the Survey will be to detail all architectural barriers at all CITY facilities.

Services to be Provided

A consultant has been select to assist with the Surveys. The consultant will record conditions of non-conformance with the criteria for each building or site element. For each barrier identified, the consultant will record the actual conditions.

The consultant will assist the Building Dept. in preparing a Draft and Final Report (run from data base) for each facility which lists barriers identified, recommended modifications, estimated conceptual costs of the changes (construction costs), and estimated construction completion date.

The consultant will provide copies of all original worksheets and contract materials. The consultant will provide all data base, and word processing to the Building Dept. in electronic format compatible with department standards.

7. ACCESSIBILITY STANDARDS AND LIST OF BARRIERS

"Accessible" Defined

The term "accessible" in the ADAAG describes a "site, building or portion thereof that can be approached, entered and used by persons with physical disabilities, and which complies with the governing standard". The standards define accessibility for people with varying types of physical disabilities including wheelchair use, visual impairment, hearing impairment, limited upper-body strength and grasping ability, and mobility impairments other than wheelchair use. Tolerance in accessibility is measured in inches, and sometimes fractions of inches. An inch can mean the difference between access, or potential injury or damage to a person with a disability.

Program Accessibility

The Regulation adopts the concept of "program accessibility", and allow public entities to make their services, programs and activities, "when viewed in their entirety," available to persons with disabilities through alternate means. Each service, program or activity must be readily accessible to and usable by persons with disabilities. **The regulation only requires entities to make physical changes to facilities when program changes will not provide accessibility.** Programs, services and activities must be provided in the most integrated setting appropriate. **The regulation explicitly states that the public entity is not required to make each of its existing facilities accessible, as long as program accessibility is provided.**

While private sector public accommodations are required to perform "readily achievable" barrier removal, a public entity does not have this obligation. However, a public entity is obligated to make all programs, services and activities accessible, except in those rare instances when doing so would result in a fundamental alteration in the nature of the program or in undue financial and administrative burdens.

Undue Burden

In determining whether financial or administrative burdens are undue, all public entity resources available for use in the funding, and operation of the service, program or activity are considered. Even when a finding of undue burden can be made, the public entity is obligated to take any other steps necessary to ensure that persons with disabilities receive the benefits or services provided. (Reference: Section 504 of the Rehabilitation Act of 1973)

Identification of Barriers

Access to and usability of CITY OF EL CENTRO facilities by individuals with disabilities is frequently compromised by the barriers listed below. This listing is not exhaustive or necessarily complete but represents typical barriers to be addressed during the transition process:

Site: Exterior routes of travel are interrupted by stairs, curbs or other changes in level; or by obstructions or protruding objects. Routes of travel from transportation stops are not accessible. Curb ramps are absent, or do not meet current requirements. Accessible routes are not clearly indicated through signage.

Parking: Numbers of accessible spaces are not proportionate total numbers of spaces, by current standards. Van accessible spaces are not provided. Accessible spaces do not completely conform to the current requirements for size, location, marking and signage. Curb ramps do not meet current requirements. Lots are not properly signed for towing. Drop-off areas are not accessible.

Building entrances: Entrances are not ramped; or ramps do not meet requirements for width, slope, cross slope, landings and/or handrail shape and height. Level landings are not provided or are not of sufficient width or depth. Doors require excessive effort to open, and close too quickly to allow safe passage. Less frequently, doors are not of sufficient width or have knob-type handles.

Interior signage: Accessibility information is not provided in building directory. Accessible facilities are not marked as accessible, and no information is posted at inaccessible facilities indicating the location of the closest accessible facility. Tactile and Braille permanent room signs are not provided.

Interior routes of travel: Lobbies, corridors and other passages have obstructions or protruding objects such as drinking fountains, telephones, and projecting signs which when improperly located may be hazardous to individuals with vision disabilities. Less frequently, interior routes of travel are interrupted by level changes which are not ramped, or ramps do not meet current requirements for width, slope, cross slope, landings and/or handrail shape and height.

Stairs: Handrails do not meet requirement for shape and height. Visual warnings are not provided at tread nosings. Less frequently, risers and treads do not meet requirements for shape or risers are open, presenting a potential tripping hazard.

Interior Doors: Doors are not sufficiently wide. Maneuvering clearance for individuals using wheelchairs is not provided. Doors require excessive effort to open, and close too quickly to allow safe passage. Doors have knob-type hardware.

Elevators: Timing on elevators requires adjustment. Call buttons and control buttons are too high. No audible signal is provided. No emergency phone is provided. Less frequently, Braille indicators are not provided; cab size is inadequate.

Public service offices: Service counters are too high.

Sanitary facilities: Doors do not meet current requirements. Signage does not meet current requirements. Maneuvering clearances are inadequate. Mounting heights of plumbing fixtures and accessories are too high. If an accessible compartment is provided, clearances and grab bars do not meet current requirements. Faucets are twist-type. Insulation is not provided on pipes under sinks.

Telephones: Mounting heights are too high. Telephones project into accessible route and are hazards to persons with vision disabilities. Text telephones are not provided where they are required. Signage indicating location of nearest text telephone is not provided.

Alarms: Visual alarms are not provided in sanitary facilities and meeting rooms, or in general where audible alarms are provided. (Visual alarms are only required when alarms are otherwise required or provided.)

Assembly areas and meeting rooms: Wheelchair seating is not provided in rooms with fixed seating. Lecterns and podiums are not accessible to individuals in wheelchairs. Assistive listening systems are not provided.

8. METHODS FOR REMOVAL

The Building Department will review the surveys and with the assistance of the consultant, prepare a draft barrier removal plan for each facility or facility group. The draft reports will be reviewed by the site occupants for concurrence, and by the ADA Coordinator in order to establish priority of barrier removal.

Typical barrier removal activities will include:

- **SITE:** Improving signage and installing curb ramps.
- **PARKING:** Increasing numbers of accessible spaces, adding van accessible spaces, restriping, and installing complying signage.
- **BUILDING ENTRANCES:** Providing conforming ramps, adjusting door pressure, installing power-operated doors.
- **INTERIOR SIGNAGE:** Providing signage which clearly describes the accessible route and accessible building elements. Provide tactile and Braille room signs.
- **INTERIOR ROUTE OF TRAVEL:** Removing protruding objects from the path of travel. Providing ramps of access lifts where steps interrupt the accessible route.
- **STAIRS:** Providing visual warning strips. Replacing nonconforming handrails where no alternate accessible route is available.
- **INTERIOR DOORS:** Altering doorways, replacing doors, adjusting door pressure and retrofitting or replacing lock sets.
- **ELEVATORS:** Adjusting timing, installing call buttons overlays to change mounting height of call buttons, replacing control buttons panels, installing emergency phones, installing reopening devices and audible signals, providing tactile and Braille signage.
- **PUBLIC SERVICE OFFICES:** Making a portion of service counters lower for access by persons in wheelchairs or persons of short stature.
- **SANITARY FACILITIES:** Remodeling toilet facilities to provide an accessible compartment, lavatory, urinal (if appropriate) and accessories.

- **TELEPHONES:** Remounting phones at accessible heights and providing text telephones where required.
- **ALARMS:** Providing visual alarms when audible alarms are present.
- **ASSEMBLY AREAS AND MEETING ROOMS:** Removing fixed seats to provide wheelchair spaces, providing portable low podiums, providing portable assistive listening systems.
- **FOOD SERVICE AREAS:** Requiring that cafeterias and concessions meet ADA Title III requirements.

9. FUNDING SOURCES

Completing comprehensive ADA surveys of all CITY OF EL CENTRO facilities is a formidable task and although accessibility modifications are required, no federal funds have specifically been provided for either the surveys or the modifications.

Although there is no minimum requirement regarding the amount of funding that must be allocated to ADA improvements, the CITY OF EL CENTRO is committed to providing access for all of its citizens.

The City of El Centro is a proud member of the California League of Cities and is committed to providing the highest quality of service to its residents. The City of El Centro is committed to providing the highest quality of service to its residents.

Each department is responsible for providing the highest quality of service to its residents.

PART FOUR:

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TRANSITION PLAN RECOMMENDATIONS

City Facilities and Parks City of El Centro

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City of El Centro Public Street Intersections

The City of El Centro must provide accessible routes along public ways within its jurisdiction. Key elements along public ways and sidewalks are the street intersections and street crossings.

Each intersection crossing must be accessible to individuals who use wheelchairs.

In order to achieve accessibility, street intersections must be constructed with compliant curb cut ramps at each corner along a path of travel.

Equal Access inspected the 560 street intersections within the City of El Centro jurisdiction to determine the existing conditions at each location. Each corner was observed for existence of a curb ramp. All existing curb ramps were inspected and conditions documented such as slope, width, top landings, obstructions, etc. Locations without curb ramps were also documented.

The findings of the street intersection inspections are documented in separate bound reports entitled "Existing Conditions Street Intersections Surveys" Volume 1 and Volume 2.

The majority of intersections observed require modification to achieve compliance. The "Existing Conditions Street Intersections Surveys" Vol.1 and 2 are resources to provide guidelines to determine the minimum work required at each location. Appropriate departments within the City of El Centro must consult and coordinate with each other to determine the scheduling priority of each location in order to complete the required modifications.

Suggested priorities are as follows:

- Priority 1- Street intersections connected to sidewalks that lead to public services and facilities
- Priority 2- Street intersections connected to sidewalks leading from bus stops
- Priority 3- Major downtown sidewalks connected to commercial businesses
- Priority 4- Redevelopment areas
- Priority 5- Residential neighborhoods

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In order to achieve accessibility, street intersections must be constructed with compliant curb cut ramps at each corner along a path of travel.

Equal Access inspected the 560 street intersections within the City of El Centro jurisdiction to determine the existing conditions at each location. Each corner was observed for existence of a curb ramp. All existing curb ramps were inspected and conditions documented such as slope, width, top landings, obstructions, etc. Locations without curb ramps were also documented.

The findings of the street intersection inspections are documented in separate bound reports entitled "Existing Conditions Street Intersections Surveys" Volume 1 and Volume 2.

The majority of intersections observed require modification to achieve compliance. The "Existing Conditions Street Intersections Surveys" Vol.1 and 2 are resources to provide guidelines to determine the minimum work required at each location. Appropriate departments within the City of El Centro must consult and coordinate with each other to determine the scheduling priority of each location in order to complete the required modifications.

Suggested priorities are as follows:

- Priority 1- Street intersections connected to sidewalks that lead to public services and facilities
- Priority 2- Street intersections connected to sidewalks leading from bus stops
- Priority 3- Major downtown sidewalks connected to commercial businesses
- Priority 4- Redevelopment areas
- Priority 5- Residential neighborhoods

CITY OF EL CENTRO**ADAMS PARK**

NO.	ITEM	LOCATION	MODIFICATION	EST. COST OF CONSTRUCTION	EST. COMP. DATE
5	WALKWAY	From public sidewalk to restrooms, play structures, lobby/picnic areas	Construct walkway with compliant slopes.	\$5,000	2003
13	SIGNAGE		Install compliant signage at restrooms.	\$300	2001
14	MEN'S TOILET		Provide a compliant accessible restroom.	\$20,000	2004
15	WOMEN'S TOILET		Provide a compliant accessible restroom.	\$20,000	2004
20	SEATING	Lunch Court/Picnic areas	Provide 5% of the total seating as accessible locations. Place accessible seating on a "level" surface along an accessible route. Install new table(s) to provide compliant accessible seating locations.	\$1,500	2002
21	REACH RANGES	Play Structures	Kinder, Intermediate, Primary play structures, and site work (grading, drainage, surfaces)	\$140,000	2005
			Estimated Total	\$186,800	

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CITY OF EL CENTRO

AGUILAR PARK

NO.	ITEM	LOCATION	MODIFICATION	EST. COST OF CONSTRUCTION	EST. COMP. DATE
2	SITE ENTRANCE SIGNAGE	Driveway entrance	Install driveway accessibility parking warning signage.	\$250	2001
3	PARKING		Provide two accessible spaces sharing an 8'-0" wide access/loading aisle - one will be "van accessible".	\$300	2001
5	WALKWAY	From accessible parking to picnic table slabs, BBQ, restrooms and play structure areas	Construct walkway with compliant slopes.	\$5,000	2003
13	SIGNAGE		Install compliant pole or wall mounted sign at "van accessible" parking space. Install compliant pole or wall mounted sign at regular accessible parking space. Install compliant signage at restrooms.	\$450	2001
14	MEN'S TOILET	Northeast area of park	Provide a compliant accessible restroom.	\$20,000	2004
15	WOMEN'S TOILET	Northeast area of park	Provide a compliant accessible restroom.	\$20,000	2004
20	SEATING	Lunch Court/Picnic area	Provide 5% of the total seating as accessible locations. Place accessible seating on a "level" surface along an accessible route. Install new table(s) to provide compliant accessible seating locations.	\$1,500	2002
21	REACH RANGES	Playground	Kinder, Intermediate, Primary play structures, and site work (grading, drainage, surfaces)	\$140,000	2005
Estimated Total				\$187,500	

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CITY OF EL CENTRO

BUCKLIN PARK

NO.	ITEM	LOCATION	MODIFICATION	EST. COST OF CONSTRUCTION	EST. COMP. DATE
2	SITE ENTRANCE SIGNAGE	All four parking locations around park	Install driveway accessibility parking warning signage.	\$250	2001
3	PARKING	Northwest corner of park	Provide two accessible spaces sharing an 8'-0" wide access/loading aisle - one space will be "van accessible".	\$150	2001
3A	PARKING	Northeast corner of park	Remove non-compliant designated disabled space. Provide one "van accessible" space.	\$250	2001
3B	PARKING	East side of Park	Remove non-compliant designated disabled space. Provide two accessible spaces sharing an 8'-0" wide access/loading aisle - one will be a "van accessible" space.	\$350	2001
3C	PARKING	South side of Park	Provide two accessible spaces sharing an 8'-0" wide access/loading aisle - one will be a "van accessible" space. Add asphalt to provide for a new accessible parking surface with slopes not exceeding 2% in any direction.	\$40,000	2004
5	WALKWAY	From accessible parking to telephones, pond, drinking fountains, gazebo, Pavillion, bridge, and restrooms and to each other	Construct walkway with compliant slopes.	\$35,000	2004
6	PED. RAMP	Along new accessible route to all facilities in park	Construct new compliant ramps as necessary to provide access.	\$7,500	2004
8	HAZARDS / PROTRUDING OBJECTS	Edge of pond and near bridge along accessible route	Install guardrail, curb, or other element to prevent falling off edge of walkway.	\$3,000	2004
9	ENTRANCE / DOOR / LANDING	Men and Women Restroom	Adjust door closer for 8.5 lbs opening force and 3 seconds close time. Install lever or other compliant handles. Provide compliant width door. Install raised threshold transition strip.	\$4,000	2004

12	DRINKING FOUNTAINS	Along accessible route through park	Install compliant Hi-Low drinking fountain. (6 loc.)	\$1,500	2002
13	SIGNAGE		Install compliant pole or wall mounted sign at "van accessible" parking space. Install compliant pole or wall mounted sign at regular accessible parking space. Install directional signage. Install compliant signage at restrooms.	\$1,500	2001
14	MEN'S TOILET	South portion of Park	Provide a compliant accessible restroom.	\$25,000	2004
14A	MEN'S TOILET	Bucklin Pavillion	Provide a compliant accessible restroom.	\$25,000	2004
15	WOMEN'S TOILET	South portion of Park	Provide a compliant accessible restroom.	\$25,000	2004
15A	WOMEN'S TOILET	Bucklin Pavillion	Provide a compliant accessible restroom.	\$25,000	2004
20	SEATING	Lunch Court/Picnic Areas	Provide 5% of the total seating as accessible locations. Place accessible seating on a "level" surface along an accessible route. Install new table(s) to provide compliant accessible seating locations.	\$1,500	2004
21	REACH RANGES	Playground	Kinder, Intermediate, Primary play structures, and site work (grading, drainage, surfaces)	\$140,000	2005
25	TELEPHONES	Near south restrooms	Lower one phone so that the coin slot is 48" above the ground. Provide a floor or ground area 30" x 48" clear in front of the accessible phone with no more than 2% slope. Install a volume control.	\$200	2001
Estimated Total				\$335,200	

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CITY OF EL CENTRO**CITY HALL BUILDING - B**

NO.	ITEM	LOCATION	MODIFICATION	EST. COST OF CONSTRUCTION	EST. COMP. DATE
10	INTERIOR DOOR	Gate from Lobby to Conference Room "B"	Provide compliant width gate.	\$800	2001
13	SIGNAGE		Install compliant signage at all permanent rooms.	\$300	2001
21	REACH RANGES	Sit-down service counters - City Clerk, Planning/Building, Housing and Finance.	Provide compliant wheelchair location at counters. Remover one fixed seat at each counter and provide complaint knee space clearances at each location.	\$2,000	2002
21A	REACH RANGES	Public Works counter	Provide a lowered compliant service counter.	\$1,500	2002
			Estimated Total	\$4,600	

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Cost estimates are approximate and are offered only to illustrate the general scope of the work.

CITY OF EL CENTRO**CITY HALL BUILDING - A**

NO.	ITEM	LOCATION	MODIFICATION	EST. COST OF CONSTRUCTION	EST. COMP. DATE
9	ENTRANCE / DOOR / LANDING	North Main Entrance doors	Adjust door closer for 8.5 lbs opening force and 3 seconds close time.	\$200	2001
10	INTERIOR DOOR	Conference Room	Adjust door closer for 5 lbs opening force and 3 seconds close time.	\$150	2001
10A	INTERIOR DOOR	City Manager's Office	Adjust door closer for 5 lbs opening force and 3 seconds close time.	\$150	2001
11	CORRIDORS / AISLES	Conference Room	Provide a minimum 36" wide path to wheelchair location.	0	
13	SIGNAGE		Apply the international symbol of accessibility at the entrance of the facility. Install compliant signage at all permanent rooms.	\$300	2001
21	REACH RANGES	Personnel	Provide a lowered compliant service counter.	\$2,000	2002
			Estimated Total	\$2,800	

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CITY OF EL CENTRO**CITY HALL COMPLEX**

NO.	ITEM	LOCATION	MODIFICATION	EST. COST OF CONSTRUCTION	EST. COMP. DATE
1	PUBLIC WAY	West entrance (From 14th Street)	Provide a portion of compliant public sidewalk at westerly entrance. Repair off-setting construction joints and/or cracks in the public sidewalk to a flush continuous surface.	\$1,800	2001
2	SITE ENTRANCE SIGNAGE	Parking lot entrance driveways	Install driveway accessibility parking warning signage.	\$250	2001
3	PARKING	Parking lot south of City Hall complex	Remove non-compliant designated disabled spaces. Provide one "van accessible" space. Provide 3 compliant accessible spaces.	\$500	2001
4	CURB RAMP	Disabled parking	Remove built-up curb ramp from area of access/loading aisle. Construct compliant concrete curb cut ramp.	\$2,001	2001
5	WALKWAY	Interior courtyard - West entrance	Either grind concrete, remove and replace, or install compliant 1:2 sloped filler to eliminate a 1/4" o 1/2" vertical change in level. Fill deteriorated finish surface to provide flush area.	\$800	2001
8	HAZARDS / PROTRUDING OBJECTS	South exterior wall of Council Chambers - display box	Install cane detection at bottom of projected obstruction.	\$600	2001
9	ENTRANCE / DOOR / LANDING	Men & Women Restrooms	Adjust door closer for 8.5 lbs opening force and 3 seconds close time. Provide compliant width door. Provide compliant strike jamb clearances.	\$1,500	2003
12	DRINKING FOUNTAINS	Near Public Restrooms	Remove drinking fountain and install compliant hi-lo fountain.	\$1,500	2001
13	SIGNAGE		Install compliant pole or wall mounted sign at "van accessible" parking space. Apply the international symbol of accessibility at the entrance of the facility. Install directional signage. Install compliant signage at all permanent rooms. Install compliant signage at restrooms.	\$800	2001
14	MEN'S TOILET	East exterior wall of Council Chambers	Provide a compliant accessible restroom.	\$20,000	2003

15	WOMEN'S TOILET	East exterior wall of Council Chambers	Provide a compliant accessible restroom.	\$20,000	2003
25	TELEPHONES	Near North Entry Gate	Lower one phone so that the coin slot is 48" above the ground. Provide a floor or ground area 30" x 48" clear in front of the accessible phone with no more than 2% slope. Install a volume control. Provide a minimum 29" long phone cord.	\$1,000	2001
Estimated Total				\$50,501	

NOTE: Architects/Contractors are responsible for compliance with all applicable codes (T-24 and ADAAG).
Cost estimates are approximate and are offered only to illustrate the general scope of the work.

CITY OF EL CENTRO

COMMUNITY CENTER

NO.	ITEM	LOCATION	MODIFICATION	EST. COST OF CONSTRUCTION	EST. COMP. DATE
2	SITE ENTRANCE SIGNAGE	Parking lot driveway entrance	Install driveway accessibility parking warning signage.	\$250	2001
3	PARKING	On site parking	Provide two accessible spaces sharing an 8'-0" wide access/loading aisle. Provide an accessible space with a 5'-0" wide access/loading aisle. Provide 3 compliant accessible spaces. Add asphalt to provide for a new accessible parking surface with slopes not exceeding 2% in any direction. Remove raised stall markers at accessible parking spaces.	\$1,000	2001
4	CURB RAMP	Disabled parking	Remove built-up curb ramp from area of access/loading aisle. Construct compliant concrete curb cut ramp.	\$500	2001
5	WALKWAY	From disabled parking to the entrance	Remove portion of walkway with excessive cross slope. Construct walkway with compliant slopes. Either grind concrete, remove and replace, or install compliant 1:2 sloped filler to eliminate a 1/4" o 1/2" vertical change in level or uneven surface.	\$1,200	2002
5A	WALKWAY	To play equipment	Construct walkway with compliant slopes.	\$500	2002
5B	WALKWAY	All doors/entrances	Either secure all loose floor mats per ADAAG specifications or remove completely.	\$150	2001
6	PED. RAMP	To raised stage	Construct a new compliant ramp, or purchase prefab. metal ramp	\$2,500	2003
9	ENTRANCE / DOOR / LANDING	North entrance to South Building	Adjust door closer for 8.5 lbs opening force and 3 seconds close time. Provide compliant width door. Install raised threshold transition strip.	\$800	2001
9A	ENTRANCE / DOOR / LANDING	Double doors into Multi-purpose rooms from breezeway. (North Bldg.)	Install lever or other compliant handles.	\$250	2001

9B	ENTRANCE / DOOR / LANDING	Women's Restroom (West Bldg.)	Adjust door closer for 8.5 lbs opening force and 3 seconds close time. Install raised threshold transition strip. Mount all door hardware at maximum 48" above the ground/floor.	\$200	2001
9C	ENTRANCE / DOOR / LANDING	Men's Restroom (West Bldg.)	Adjust door closer for 8.5 lbs opening force and 3 seconds close time. Install raised threshold transition strip. Mount all door hardware at maximum 48" above the ground/floor.	\$200	2001
9D	ENTRANCE / DOOR / LANDING	Office entrance	Adjust door closer for 8.5 lbs opening force and 3 seconds close time. Install lever or other compliant handles. Install raised threshold transition strip.	\$400	2001
10	INTERIOR DOOR	All South building doors	Install lever handles. (5 doors)	\$500	2001
12	DRINKING FOUNTAINS	Breezeway	Remove drinking fountain and install compliant hi-lo fountain.	\$1,500	2001
13	SIGNAGE		Install compliant pole or wall mounted sign at "van accessible" parking space. Install compliant pole or wall mounted sign at regular accessible parking space. Apply the international symbol of accessibility at the entrance of the facility. Install directional signage. Install compliant signage at all permanent rooms. Install compliant signage at restrooms.	\$600	2001
14	MEN'S TOILET	Breezeway	Provide a compliant accessible restroom.	\$10,000	2004
15	WOMEN'S TOILET	Breezeway	Provide a compliant accessible restroom.	\$10,000	2004
21	REACH RANGES	Play Structures	Kinder, Intermediate, Primary play structures, and site work (grading, drainage, surfaces)	\$140,000	2005
22	ASSISTIVE LISTENING DEVICES	Multi-purpose hall/auditorium	Assistive listening devices (base unit and two remote receivers) to be provided only if amp/PA is utilized at subject site.	\$2,500	2003
25	TELEPHONES	Breezeway	Lower one phone so that the coin slot is 48" above the ground. Provide a minimum 29" long phone cord.	\$200	2001
Estimated Total				\$173,250	

NOTE: Architects/Contractors are responsible for compliance with all applicable codes (T-24 and ADAAG). Cost estimates are approximate and are offered only to illustrate the general scope of the work.

CITY OF EL CENTRO**COUNCIL CHAMBERS**

NO.	ITEM	LOCATION	MODIFICATION	EST. COST OF CONSTRUCTION	EST. COMP. DATE
6	PED. RAMP	Main interior ramp- south side of Auditorium	Install compliant handrails.	\$1,500	2002
8	HAZARDS / PROTRUDING OBJECTS	Wall immediately inside Entry	Remove protruding shelf and relocate. Install cane detection at protruding obstruction.	\$400	2001
9	ENTRANCE / DOOR / LANDING	South main entrance to Chambers	Adjust door closer for 8.5 lbs opening force and 3 seconds close time. Either securely fasten the loose mat to the floor per ADAAG specifications or remove it.	\$300	2001
13	SIGNAGE		Apply the international symbol of accessibility at the entrance of the facility. Install directional signage.	\$200	2001
20	SEATING	Auditorium	Provide 1% of the total seating count for compliant wheelchair locations with adjacent companion seating. Main compliant site lines. Provide 1% of the total seating count for compliant semi-ambulant seats. Provide 1% of the total seating count as armless seats.	\$5,000	2003
21	REACH RANGES	Table in front of Council	Provide compliant knee space for wheelchair location.	\$800	2001
Estimated Total				\$8,200	

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CITY OF EL CENTRO**EQUESTRIAN PARK**

NO.	ITEM	LOCATION	MODIFICATION	EST. COST OF CONSTRUCTION	EST. COMP. DATE
2	SITE ENTRANCE SIGNAGE	At parking space pole signs	Install driveway accessibility parking warning signage.	\$250	2001
3	PARKING	Near concrete patio area	Provide two accessible spaces sharing an 8'-0" wide access/loading aisle - one will be "van accessible".	\$2,000	2002
5	WALKWAY	From accessible parking to patio and ramp up to bleacher seats	Construct walkway with compliant slopes.	\$3,000	2004
6	PED. RAMP	From parking or walkway up to bleacher seats	Construct a new compliant ramp.	\$7,000	2004
13	SIGNAGE		Install compliant pole or wall mounted sign at "van accessible" parking space. Install compliant pole or wall mounted sign at regular accessible parking space. Install directional signage.	\$350	2002
20	SEATING	Bleachers	Provide 1% of the total seating count for compliant wheelchair locations with adjacent companion seating. Maintain compliant site lines.	\$5,000	2002
Estimated Total				\$17,600	

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CITY OF EL CENTRO**FRAZIER PARK**

NO.	ITEM	LOCATION	MODIFICATION	EST. COST OF CONSTRUCTION	EST. COMP. DATE
2	SITE ENTRANCE SIGNAGE	Parking area driveway entrance	Install driveway accessibility parking warning signage.	\$250	2002
3	PARKING	Near restrooms and walkway to concession bldg.	Provide two accessible spaces sharing an 8'-0" wide access/loading aisle - one will be a "van accessible". Add asphalt to provide for a new accessible parking surface with slopes not exceeding 2% in any direction.	\$50,000	2004
5	WALKWAY	From new disabled parking to restrooms, concession building and playing fields	Construct walkway with compliant slopes.	\$2,500	2004
13	SIGNAGE		Install compliant pole or wall mounted sign at "van accessible" parking space. Install directional signage. Install compliant signage at restrooms.	\$450	2004
14	MEN'S TOILET	Near parking area	Provide a compliant accessible restroom.	\$20,000	2004
15	WOMEN'S TOILET	Near parking area	Provide a compliant accessible restroom.	\$20,000	2004
20	SEATING	Bleachers	Provide 1% of the total seating count for compliant wheelchair locations with adjacent companion seating. Maintain compliant site lines. Provide 1% of the total seating count for compliant semi-ambulant seats. Provide 1% of the total seating count as armless seats.	\$4,000	2004
21	REACH RANGES	Concession Building	Provide a lowered compliant service counter.	\$5,000	2004
Estimated Total				\$102,200	

NOTE: Architects/Contractors are responsible for compliance with all applicable codes (T-24 and ADAAG). Cost estimates are approximate and are offered only to illustrate the general scope of the work.

BARRIER REMOVAL PLAN
CITY OF EL CENTRO

GOMEZ PARK

NO.	ITEM	LOCATION	MODIFICATION	EST. COST OF CONSTRUCTION	EST. COMP. DATE
3	PARKING	North end of park	Provide two accessible spaces sharing an 8'-0" wide access/loading aisle. Add asphalt to provide for a new accessible parking surface with slopes not exceeding 2% in any direction.	\$6,000	2004
4	CURB RAMP	Playground equipment area	Construct compliant built-up curb ramp to provide access to playground.	\$500	2003
5	WALKWAY	From disabled parking to existing park walkway	Construct walkway with compliant slopes.	\$1,500	2003
5A	WALKWAY	End of existing walkway near play area	Provide a concrete 5' 0" diameter turning area.	\$650	2003
5B	WALKWAY	Walkway between picnic areas	Either grind concrete, remove and replace, or install compliant 1:2 sloped filler to eliminate a 1/4" o 1/2" vertical change in level.	\$500	2003
13	SIGNAGE		Install compliant pole or wall mounted sign at "van accessible" parking space. Install compliant pole or wall mounted sign at regular accessible parking space. Install compliant signage at all permanent rooms.	\$450	2004
14	MEN'S TOILET		Provide a compliant accessible restroom.	\$20,000	2004
15	WOMEN'S TOILET		Provide a compliant accessible restroom.	\$20,000	2004
20	SEATING	Lunch Court/Picnic areas	Provide 5% of the total seating as accessible locations. Place accessible seating on a "level" surface along an accessible route. Install new table(s) to provide compliant accessible seating locations at each covered picnic area.	\$700	2002
21	REACH RANGES	Playground	Kinder, Intermediate, Primary play structures, and site work (grading, drainage, surfaces)	\$140,000	2005
Estimated Total				\$190,300	

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CITY OF EL CENTRO**LIBRARY**

NO.	ITEM	LOCATION	MODIFICATION	EST. COST OF CONSTRUCTION	EST. COMP. DATE
2	SITE ENTRANCE SIGNAGE	Parking lot entrance	Install driveway accessibility parking warning signage.	\$250	2001
3	PARKING	Parking lot west of Library	Remove non-compliant designated disabled space. Provide one "van accessible" space. Provide two accessible spaces sharing an 8'-0" wide access/loading aisle. Add asphalt to provide for a new accessible parking surface with slopes not exceeding 2% in any direction.	\$1,000	2001
5	WALKWAY	From parking lot up to westerly entrance	Either grind concrete, remove and replace, or install compliant 1:2 sloped filler to eliminate a 1/4" o 1/2" vertical change in level at bottom of walkway.	\$2,000	2001
6	PED. RAMP	North main entrance	Remove non-compliant ramp. Install compliant handrails. Construct a new compliant ramp. Modify top landing to make compliant. Modify bottom landing to make compliant.	\$35,000	2004
7	STAIRWAY	Main north entrance	Install compliant handrails. Apply high contrast striping to treads.	\$1,800	2002
7A	STAIRWAY	West entrance	Install compliant handrails. Apply high contrast striping to treads.	\$900	2002
9	ENTRANCE / DOOR / LANDING	Main north entrance	Adjust door closer for 8.5 lbs opening force and 3 seconds close time. Provide compliant width door. Install kick plate to bottom of glass door. Exit landing	\$30,000	2004
9A	ENTRANCE / DOOR / LANDING	Westerly entrance to Library	Adjust door closer for 8.5 lbs opening force and 3 seconds close time. Provide compliant strike jamb clearances. Install raised threshold transition strip.	\$900	2002
9B	ENTRANCE / DOOR / LANDING	"Magee Room"	Adjust door closer for 8.5 lbs opening force and 3 seconds close time.	\$150	2001
10	INTERIOR DOOR	Library - Women's Room	Install lever handles. Provide compliant width door.	\$2,000	2002
10A	INTERIOR DOOR	Library - Men's Room	Install lever handles. Provide compliant width door.	\$2,000	2002
10B	INTERIOR DOOR	To the "Magee Room"	Provide compliant strike jamb clearances.	\$450	2002

10C	INTERIOR DOOR	Magee Room - Women's Room	Adjust door closer for 5 lbs opening force and 3 seconds close time. Provide compliant width door.	\$500	2002
10D	INTERIOR DOOR	Men - "Magee Room"	Provide compliant width door.	\$1,500	2002
11	CORRIDORS / AISLES	Book Drop box/Near "Mysteries, "Historical", "Westerns", and "Sci-Fi".	Provide a minimum 42" wide corridor.	\$300	2001
11A	CORRIDORS / AISLES	Paper back book area and "Non-Fiction".	Provide compliant turnaround at corridor dead end.	\$200	2001
13	SIGNAGE		Install compliant pole or wall mounted sign at "van accessible" parking space. Install compliant pole or wall mounted sign at regular accessible parking space. Apply the international symbol of accessibility at the entrance of the facility. Install directional signage. Install compliant signage at all permanent rooms. Install compliant signage at restrooms.	\$600	2001
14	MEN'S TOILET	Library	Provide a compliant accessible restroom.	\$10,000	2004
15	WOMEN'S TOILET	Library	Provide a compliant accessible restroom.	\$10,000	2004
16	MEN'S TOILET	"Magee Room"	Install compliant faucet handles. Insulate the pipes. Provide self-closing partition door. Install coat hook at + 48".	\$600	2001
17	WOMEN'S TOILET	"Magee Room"	Install compliant faucet handles. Insulate the pipes. Provide self-closing partition door. Install coat hook at + 48".	\$600	2001
20	SEATING	Library/Media Center	Provide 5% of the total seating as accessible locations including "Computer Catalog Station" and "Microfilm Review. Provide accessible seating at computer stations.	\$1,000	2002
22	ASSISTIVE LISTENING DEVICES	"Magee Room"	Assistive listening devices (base unit and two remote receivers) to be provided only if amp/PA is utilized at subject site.	\$2,500	2003
25	TELEPHONES	Outside near north entrance	Lower one phone so that the coin slot is 48" above the ground. Provide a floor or ground area 30" x 48" clear in front of the accessible phone with no more than 2% slope. Install a volume control.	\$200	2001
Estimated Total				\$104,450	

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McGEE PARK

NO.	ITEM	LOCATION	MODIFICATION	EST. COST OF CONSTRUCTION	EST. COMP. DATE
5	WALKWAY	From "Community Center" to covered picnic area and playground equipment	Construct walkway with compliant slopes.	\$2,500	2002
5A	WALKWAY	From public sidewalk to play equipment and picnic areas	Construct walkway with compliant slopes.	\$2,500	2002
20	SEATING	Lunch Court/Picnic area	Provide 5% of the total seating as accessible locations. Place accessible seating on a "level" surface along an accessible route. Install new table(s) to provide compliant accessible seating locations.	\$1,500	2002
21	REACH RANGES	Playground area	Kinder, Intermediate, Primary play structures, and site work (grading, drainage, surfaces)	\$140,000	2005
			Estimated Total	\$146,500	

NOTE: Architects/Contractors are responsible for compliance with all applicable codes (T-24 and ADAAG). Cost estimates are approximate and are offered only to illustrate the general scope of the work.

CITY OF EL CENTRO

PITTMAN PARK

NO.	ITEM	LOCATION	MODIFICATION	EST. COST OF CONSTRUCTION	EST. COMP. DATE
2	SITE ENTRANCE SIGNAGE	Parking lot driveway entrance	Install driveway accessibility parking warning signage.	\$250	2004
3	PARKING	Dirt parking area on site	Provide two accessible spaces sharing an 8'-0" wide access/loading aisle. Add asphalt to provide for a new accessible parking surface with slopes not exceeding 2% in any direction.	\$50,000	2004
5	WALKWAY	From disabled parking to restrooms, concession/ticket windows, and bleachers	Construct walkway with compliant slopes.	\$10,000	2004
9	ENTRANCE / DOOR / LANDING	Women's restroom	Adjust door closer for 8.5 lbs opening force and 3 seconds close time. Vestibule space outside door is not of compliant size.	\$700	2002
9A	ENTRANCE / DOOR / LANDING	Men's restroom	Vestibule space outside door is not of compliant size.	\$500	2002
11	CORRIDORS / AISLES	Concession/ticket window queue rails	Provide a minimum 36" wide corridor and compliant turn-around space.	\$1,500	2002
12	DRINKING FOUNTAINS	Near concession building	Remove drinking fountain and install compliant hi-lo fountain.	\$1,500	2001
13	SIGNAGE		Install compliant pole or wall mounted sign at "van accessible" parking space. Install compliant pole or wall mounted sign at regular accessible parking space. Install directional signage. Install compliant signage at restrooms.	\$600	2004
14	MEN'S TOILET	Near parking area	Provide a compliant accessible restroom.	\$20,000	2004
15	WOMEN'S TOILET	Near parking area	Provide a compliant accessible restroom.	\$20,000	2004
20	SEATING	Bleachers	Provide 1% of the total seating count for compliant wheelchair locations with adjacent companion seating. Maintain compliant site lines.	\$4,000	2004
Estimated Total				\$109,050	

NOTE: Architects/Contractors are responsible for compliance with all applicable codes (T-24 and ADAAG). Cost estimates are approximate and are offered only to illustrate the general scope of the work.

CITY OF EL CENTRO**POLICE DEPARTMENT**

NO.	ITEM	LOCATION	MODIFICATION	EST. COST OF CONSTRUCTION	EST. COMP. DATE
5	WALKWAY	To Front Entrance	Either grind concrete, remove and replace, or install compliant 1:2 sloped filler to eliminate a 1/4" o 1/2" vertical change in level at walkway finish change and entry door threshold.	\$800	2001
6	PED. RAMP	Inmate Access	Construct a new compliant ramp at inmate entrance.	\$2,000	2003
8	HAZARDS / PROTRUDING OBJECTS	Raised stair landing in corridor	Install cane detection at protruding obstruction.	\$500	2001
8A	HAZARDS / PROTRUDING OBJECTS	Public telephone	Install cane detection at protruding obstruction.	\$500	2001
9	ENTRANCE / DOOR / LANDING	Easterly main entrance	Adjust door closer for 8.5 lbs opening force and 3 seconds close time. Remove sloped landing and construct compliant landing. Install kick plate to bottom of glass door.	\$1,000	2001
9A	ENTRANCE / DOOR / LANDING	Westerly entrance door near holding cells	Adjust door closer for 8.5 lbs opening force and 3 seconds close time. Install lever or other compliant handles.	\$400	2001
10	INTERIOR DOOR	Opening from corridor to restrooms	Provide compliant width opening.	\$500	2003
13	SIGNAGE		Apply the international symbol of accessibility at the entrance of the facility. Install directional signage. Install compliant signage at all permanent rooms. Install compliant signage at restrooms.	\$600	2001
14	MEN'S TOILET	Near Lobby	Provide a compliant accessible restroom.	\$20,000	2003
14A	MEN'S TOILET	Near Holding Cells (secure area)	Provide a compliant accessible restroom.	\$20,000	2003
15	WOMEN'S TOILET	Near Lobby	Provide a compliant accessible restroom.	\$20,000	2003
15A	WOMEN'S TOILET	Near Holding Cells (secure area)	Provide a compliant accessible restroom.	\$20,000	2003
21	REACH RANGES	Entry Lobby	Provide a lowered compliant reception counter.	\$2,000	2003

25	TELEPHONES	Front of Police Department	Install a volume control.	\$100	2001
25A	TELEPHONES	Night Service phone near Reception counter	Lower one phone so that the coin slot is 48" above the ground. Provide a floor or ground area 30" x 48" clear in front of the accessible phone with no more than 2% slope.	\$200	2001
Estimated Total				\$88,600	

NOTE: Architects/Contractors are responsible for compliance with all applicable codes (T-24 and ADAAG).
Cost estimates are approximate and are offered only to illustrate the general scope of the work.

CITY OF EL CENTRO

POST OFFICE (ART COUNCIL)

NO.	ITEM	LOCATION	MODIFICATION	EST. COST OF CONSTRUCTION	EST. COMP. DATE
2	SITE ENTRANCE SIGNAGE	Parking lot driveway entrance	Install driveway accessibility parking warning signage.	\$250	2001
3	PARKING	West side of Facility	Remove non-compliant designated disabled space. Provide two accessible spaces sharing an 8'-0" wide access/loading aisle. Add asphalt to provide for a new accessible parking surface with slopes not exceeding 2% in any direction.	\$1,000	2001
5	WALKWAY	From disabled parking to westerly ramp	Paint a 48" wide compliant access aisle across the driveway.	\$250	2001
6	PED. RAMP	West side of Facility	Remove non-compliant ramp. Install compliant handrails. Construct a new compliant ramp.	\$6,000	2003
6a	PED. RAMP	Front main entrance (easterly side)	Construct a new compliant ramp.	\$12,000	2003
10	INTERIOR DOOR	Men and Women Restroom doors	Adjust door closer for 5 lbs opening force and 3 seconds close time. Provide compliant strike jamb clearances.	\$1,000	2001
12	DRINKING FOUNTAINS	Corridor	Relocate low drinking fountain so that spout is 36" above the floor.	\$1,500	2001
13	SIGNAGE		Install compliant pole or wall mounted sign at "van accessible" parking space. Install compliant pole or wall mounted sign at regular accessible parking space. Apply the international symbol of accessibility at the entrance of the facility. Install directional signage. Install compliant signage at all permanent rooms. Install compliant signage at restrooms.	\$800	2001
14	MEN'S TOILET	Corridor to Auditorium	Install compliant faucet handles. Lower the urinal to make compliant. Place all accessories so that the operable parts are 40" above the floor. Insulate the drain pipes. Provide self-closing partition door. Install pull handle on inside of partition door. Install a sliding or rotating privacy lock. Provide flush valve on "open" side of toilet or install sensor device.	\$4,000	2003

15	WOMEN'S TOILET	Corridor to Auditorium	Install compliant grab bars. Install compliant faucet handles. Insulate the drain pipes. Provide a 34" self-closing partition door. Install pull handle on inside of partition door. Provide sliding or rotating privacy lock. Relocate accessible toilet to 18" on center from the adjacent wall and provide flush valve on "open" side.	\$4,000	2003
21	REACH RANGES	Lobby reception counter	Provide a lowered compliant reception counter.	\$2,000	2002
22	ASSISTIVE LISTENING DEVICES	Auditorium	Assistive listening devices (base unit and two remote receivers) to be provided only if amp/PA is utilized at subject site.	\$2,500	2003
Estimated Total				\$35,300	

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CITY OF EL CENTRO**STARK FIELD**

NO.	ITEM	LOCATION	MODIFICATION	EST. COST OF CONSTRUCTION	EST. COMP. DATE
2	SITE ENTRANCE SIGNAGE	All driveway entrances	Install driveway accessibility parking warning signage.	\$250	2001
3	PARKING	Near bleachers/main field	Remove non-compliant designated disabled space. Provide 4 compliant accessible spaces - one will be "van accessible". Add asphalt to provide for a new accessible parking surface with slopes not exceeding 2% in any direction.	\$1,800	2001
3A	PARKING	Near restrooms and other playing fields	Provide one "van accessible" space. Add asphalt to provide for a new accessible parking surface with slopes not exceeding 2% in any direction.	\$20,000	2004
5	WALKWAY	From accessible parking at main bleachers to restrooms and other fields	Construct walkway with compliant slopes.	\$10,000	2004
6	PED. RAMP	Main ramp up to bleachers	Adjust metal ramp to provide maximum 8.33% slope - middle and upper legs.	\$2,000	2002
9	ENTRANCE / DOOR / LANDING	Men and Women restroom	Install raised threshold transition strip.	\$400	2004
12	DRINKING FOUNTAINS	Northwest of stadium bleachers	Remove drinking fountain and install compliant hi-lo fountain.	\$1,500	2002
13	SIGNAGE		Install compliant pole or wall mounted sign at "van accessible" parking space. Install compliant pole or wall mounted sign at regular accessible parking space. Install directional signage. Install compliant signage at restrooms.	\$600	2001
14	MEN'S TOILET	South of stadium bleachers	Provide a compliant accessible restroom.	\$20,000	2004
15	WOMEN'S TOILET	South of stadium bleachers	Provide a compliant accessible restroom.	\$20,000	2004
19	UNISEX RESTROOM	Northwest of stadium bleachers near drinking fountains	Construct a new compliant unisex restroom.	\$20,000	2004

20	SEATING	Lunch Court/Picnic tables	Provide 5% of the total seating as accessible locations. Place accessible seating on a "level" surface along an accessible route. Install new table's) to provide compliant accessible seating locations.	\$1,500	2002
20A	SEATING	Bleachers	Provide 1% of the total seating count for compliant wheelchair locations with adjacent companion seating. Maintain compliant site lines. Provide 1% of the total seating count for compliant semi-ambulant seats.	\$5,000	2002
21	REACH RANGES	Concession building	Provide a lowered compliant service counter.	\$5,000	2004
21A	REACH RANGES	Playground	Kinder, Intermediate, Primary play structures, and site work (grading, drainage, surfaces)	\$140,000	2005
Estimated Total				\$248,050	

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CITY OF EL CENTRO

SWARTHOUT PARK

NO.	ITEM	LOCATION	MODIFICATION	EST. COST OF CONSTRUCTION	EST. COMP. DATE
2	SITE ENTRANCE SIGNAGE	Parking lot driveway entrances	Install driveway accessibility parking warning signage.	\$250	2001
3	PARKING		Provide 6 compliant accessible spaces - one will be "van accessible".	\$750	2001
4	CURB RAMP	Playground structures and covered picnic area	Construct compliant built-up curb ramp - as necessary for access.	\$1,000	2002
5	WALKWAY	From accessible parking to play equipment, restrooms, BBQ, and covered picnic areas	Construct walkway with compliant slopes.	\$1,250	2002
5A	WALKWAY	Walkway around restroom building	Maintain 36" clear minimum width of walkway.	\$500	2002
12	DRINKING FOUNTAINS	Near restrooms	Remove drinking fountain and install compliant hi-lo fountain.	\$1,500	2001
13	SIGNAGE		Install compliant pole or wall mounted sign at "van accessible" parking space. Install compliant pole or wall mounted sign at regular accessible parking space. Install compliant signage at restrooms.	\$450	2001
14	MEN'S TOILET		Provide a compliant accessible restroom.	\$20,000	2004
15	WOMEN'S TOILET		Provide a compliant accessible restroom.	\$20,000	2004
20	SEATING	Lunch Court/Picnic area	Provide 5% of the total seating as accessible locations. Place accessible seating on a "level" surface along an accessible route. Install new table(s) to provide compliant accessible seating locations.	\$1,500	2002
21	REACH RANGES	Play Structures	Kinder, Intermediate, Primary play structures, and site work (grading, drainage, surfaces)	\$140,000	2005
21A	REACH RANGES	Concession Building	Provide a lowered compliant service counter.	\$5,000	2004
			Estimated Total	\$192,200	

NOTE: Architects/Contractors are responsible for compliance with all applicable codes (T-24 and ADAAG). Cost estimates are approximate and are offered only to illustrate the general scope of the work.

BARRIER REMOVAL PLAN
CITY OF EL CENTRO

YOUTH CENTER

NO.	ITEM	LOCATION	MODIFICATION	EST. COST OF CONSTRUCTION	EST. COMP. DATE
2	SITE ENTRANCE SIGNAGE	Parking lot driveway entrances	Install driveway accessibility parking warning signage.	\$250	2001
3	PARKING	South of Gym	Remove non-compliant designated disabled space. Provide two accessible spaces sharing an 8'-0" wide access/loading aisle.	\$300	2001
4	CURB RAMP	Disabled parking	Remove built-up curb ramp from area of access/loading aisle. Construct compliant concrete curb cut ramp.	\$1,000	2001
5	WALKWAY	East side of Gym at top of ramp to playground	Remove portion of walkway with excessive cross slope. Construct walkway with compliant slopes.	\$1,500	2002
5A	WALKWAY	From covered patio to gazebo	Construct walkway with compliant slopes.	\$500	2002
5B	WALKWAY	To children's playground equipment west of covered patio.	Construct walkway with compliant slopes.	\$500	2002
5C	WALKWAY	In front of ticket windows (west building)	Remove portion of walkway with excessive cross slope. Construct walkway with compliant slopes.	\$800	2002
6	PED. RAMP	West side of pool	Remove non-compliant ramp. Install compliant handrails. Construct a new compliant ramp. Modify bottom landing to make compliant.	\$1,800	2002
8	HAZARDS / PROTRUDING OBJECTS	Covered raised pation	Install guardrail, curb, or other element to prevent falling off edge of raised patio.	\$1,000	2002
9	ENTRANCE / DOOR / LANDING	South and west main entrances into Gym	Adjust door closer for 8.5 lbs opening force and 3 seconds close time.	\$150	2001
9A	ENTRANCE / DOOR / LANDING	Easterly entrance into Shower /Changing Building	Adjust door closer for 8.5 lbs opening force and 3 seconds close time.	\$150	2001
9B	ENTRANCE / DOOR / LANDING	Women Restroom	Adjust door closer for 8.5 lbs opening force and 3 seconds close time.	\$150	2001

9C	ENTRANCE / DOOR / LANDING	Men Restroom	Adjust door closer for 8.5 lbs opening force and 3 seconds close time.	\$150	2001
10	INTERIOR DOOR	From Lobby to Gymnasium	Adjust door closer for 5 lbs opening force and 3 seconds close time.	\$150	2001
13	SIGNAGE		Parking, directional, permanent rooms, and restrooms	\$1,200	2001
14	MEN'S TOILET	Changing/Shower Building	Provide a compliant accessible restroom.	\$8,000	2003
15	WOMEN'S TOILET	Changing/Shower Building	Provide a compliant accessible restroom.	\$8,000	2003
16	MEN'S TOILET	Pool/Office Building (west side of site)	Provide a compliant accessible restroom.	\$8,000	2003
17	WOMEN'S TOILET	Pool/Office Building (west side of site)	Provide a compliant accessible restroom.	\$8,000	2003
20	SEATING	Lunch Court - Picnic Tables	Provide 5% of the total seating as accessible locations. Place accessible seating on a "level" surface along an accessible route. Install new table(s) to provide compliant accessible seating locations.	\$1,500	2002
20A	SEATING	Gym Lobby	Provide 5% of the total seating as accessible locations. Place accessible seating on a "level" surface along an accessible route. Install new table(s) to provide compliant accessible seating locations.	\$1,500	2002
21	REACH RANGES	Ticket Windows (West Building)	Provide a compliant ticket window counter.	\$2,000	2002
21A	REACH RANGES	Gymnasium counter (Lobby)	Provide a lowered compliant service counter.	\$2,000	2002
21B	REACH RANGES	Pool/Office Building (west side of site)	Provide a pool transfer device.	\$1,000	2001
21C	REACH RANGES	Play Structures	Kinder, Intermediate, Primary play structures, and site work (grading, drainage, surfaces)	\$140,000	2004
25	TELEPHONES	Shower/Changing Building	Lower one phone so that the coin slot is 48" above the ground. Provide a floor or ground area 30" x 48" clear in front of the accessible phone with no more than 2% slope. Install a volume control.	\$200	2001
Estimated Total				\$189,800	

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